

SAFETY MANUAL

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PASSION. INTEGRITY. TEAMWORK

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INTRODUCTION

Zwick Construction Company has a solid reputation within the construction industry that exemplifies its devotion to its clients, working hard since 1969 to differentiate our company in the commercial construction industry. Since our first day of business, Zwick has always provided a safe working environment.

Safety is critical to everyone's needs and will not be compromised. Every employee on a Zwick project must understand the importance of safety and know that they will return home to family and friends again and again, day after day unharmed and injury free.

Zwick Construction's core values are an important motivator for all that Zwick stands for and believes. These three core values are Passion, Integrity, and Teamwork. Each one of these values shares in a properly managed safety program.

First, every associate demonstrate their **PASSION** when they proactively manage safety and follow through on enforcing a safe work environment.

Next, every associate demonstrates their **INTEGRITY** by being complete and accountable for safe work practices. With every unsafe condition comes the choice to correct it or ignore it. By engaging with our integrity we ensure a safe workplace for all.

Last, every associate demonstrates their **TEAMWORK** by actively engaging in safe work practices. Zwick Construction team members must all take active roles in managing safety on a jobsite by communicating concerns, experiences and findings on the project.

By embracing each of the above core values, Zwick Construction is confident that each project will be safe and will be a satisfying experience for all involved. Thank you for helping keep our jobsite safe and for being part of the Zwick Construction team. There is nothing more important than our people and their families.



Darin Zwick
President / CEO
Zwick Construction Company

SAFETY POLICY STATEMENT

Every jobsite is subject to visits from the Occupational Health and Safety Administration (OSHA). OSHA was established to regulate the safety of each worker in the construction industry. Zwick understands that, above all else, ensuring the safety of our employees is the most important effort we can make. For this purpose Zwick Construction has written this Safety Program. Each project will be required to have a copy of this Safety Program on site at all times.

In addition to this manual Zwick will also require a site-specific safety plan as part of their general safety plan. This site-specific plan will include, but should not be limited to, the following:

1. Copies of all Subcontractor safety programs
2. Safety orientation meetings
3. Weekly subcontractor safety meetings

Zwick Construction is committed to ensuring that employees arrive home safely at the end of each day, and will enforce safety policies on all people that access the project.

SAFETY PROGRAM GOALS AND OBJECTIVES

Zwick Construction's commitment to personal and public safety is expressed in the following goals. We believe complete adherence to the Zwick Safety Program will result in the following:

1. Zero accidents with zero tolerance for unsafe behavior
2. No OSHA violations for unsafe conditions

We'll accomplish this through:

1. Providing safety orientation for 100% of personnel
2. Maintaining a clean and orderly jobsite
3. Maintaining current and accurate safety documentation

Anything less than these objectives or effort is not acceptable. The effort of all team members is necessary in order to fully achieve our goals.

EMPLOYEE COMMITMENT AND RESPONSIBILITIES

Zwick Construction recognizes that the success of any company-wide endeavor is dependent upon our employees. The company also recognizes the value of involvement of individual employees to assist in realizing the goals that we have set as a company.

All employees are expected to become involved in the implementation of Zwick Construction's safety and health program.

Zwick Construction Employee Responsibilities include:

1. Report to your supervisor all unsafe conditions encountered in the workplace.
2. Report immediately to your supervisor any injury sustained at work or any work related illness or within 24 hours after the discovery of the injury or illness.
3. Perform all job duties in a safe manner.
4. Never begin any job until you have been properly trained and granted the authority to perform the job.
5. Never remove, displace, damage or destroy any safety devices, notices or warnings.
6. Abide by all federal (OSHA), state, and local safety and health regulations as well as those safety policies and procedures established in the Zwick Safety Program.

Adhering to the policies and procedures of the Safety Program is not optional; it is expected and required. Initial and continued employment with Zwick Construction is contingent upon recognizing and abiding by the safety policies and procedures established by Zwick.

ZWICK EMPLOYEE SAFETY TRAINING

Zwick Construction is 100% committed to training all employees. Maintaining a safe environment is the priority. Zwick Construction provides a safety and health orientation program to educate employees about company policies, procedures and safe work practices. A Zwick Construction Safety Program is located at each project office, corporate office, and each employee is given a personal copy for their use. Digital copies of the program will be stored on the company network which is accessible by all employees.

MONTHLY TRAINING

Safety is in the monthly company training curriculum which encourages open discussion to fully understand the safety policies and to improve the safety program.

SAFETY ORIENTATION

Each jobsite provides safety orientations to Zwick employees.

SPECIALTY TRAINING

Project staff will be trained in OSHA standards, First Aid and CPR. This will prepare project teams to effectively respond in emergencies. Zwick Construction will reimburse all employees who successfully complete the OSHA 30 Hour Certification and other specialty certifications. Other third-party trainings will be announced as they become known and employees will be encouraged to register for these trainings at no cost to the employee.

SAFETY COMMUNICATION

Zwick Construction employees will be involved in the implementation of the safety and health program. Zwick Construction encourages and requires employees to be responsible for the implementation of the safety program for their respective areas or departments.

IDENTIFY

Zwick Construction employees are not required to work in areas that they feel are unsafe or unhealthy. If an employee believes they are working in an unsafe environment they should contact their supervisor or the Safety Director immediately.

SAFETY INSPECTIONS AND OSHA CONSULTATIONS

Zwick Construction projects are inspected weekly by Zwick Construction staff and periodically by an OSHA Consultation Specialist. These inspections are to aid in identifying any existing and potential hazards. Prompt corrective actions must be taken on any and all hazards identified. Any corrective measures requiring a longer abatement period must receive the approval of the trained safety professional or appointed person.

SAFETY REPORTS

Each project is required to complete a weekly safety report. These reports must be completed by the assigned construction staff and signed by the Superintendent and Project Manager. These reports are to be handwritten or typed and filed in the jobsite safety binder and uploaded to the project management software's daily log and document folder.

SAFETY COMMUNICATION

Zwick communicates safe work practices to employees in a variety of ways. Some of these methods include:

1. Jobsite Safety Orientations
2. Safety Inspections
3. Jobsite Safety Meetings
4. Jobsite Team Meetings
5. Weekly PM/PX Meetings
6. Company Monthly Trainings
7. E-mail / Memos
8. Photos / Video
9. Project Management Software

DISCIPLINARY POLICY

Zwick Construction employees will be disciplined in accordance with the company disciplinary policies and procedures. For more information, contact the Safety Director.

RECORD KEEPING

All project safety communications must be kept on file in each project's construction office and archived with the project's file after completion of the project. Digital files are to be stored within the project management software.

AUTHORITY AND RESPONSIBILITY

Zwick Construction believes in the importance of TEAMWORK and expects employees to equally share in the responsibility of strong safety management. Listed below are the team players and their authority and responsibilities.

Safety Director: Provide the knowledge and expertise of an effective safety program. Implement and enforce the company safety policies. Conduct periodic safety inspections and report findings to Superintendents and upper management. Investigate all accidents that occur within the company. Coordinate and participate in all OSHA consultations. Provide all federal, state and local safety code requirements. Provide safety training to company staff. Review company safety program for accuracy and effectiveness and make updates as necessary.

Project Executive: Oversees that each project is provided with the necessary safety equipment and that the safety program is being followed. Project Executives will visit their respective projects and provide feedback to Project Managers and Superintendents where safety can be improved. Feedback is provided in writing and then followed up as directed by the Project Executive.

Project Manager: Directly responsible for each assigned project to see that safety is addressed and Zwick Construction procedures are followed. Project Managers work directly with Superintendents and support each other in seeing that documentation, reports, weekly meetings, etc. are kept and maintained. Emergencies are reported directly to the Project Manager who in turn will notify the necessary parties affected. Project Managers will report back to Project Executives on all matters regarding their projects. Detailed information regarding Superintendent and Project Manager Safety responsibilities are also provided in the section outlining Superintendent and Project Manager Job Site Safety and Risk Control Responsibilities.

Project Superintendent: Directly responsible for the day-to-day activities on the project. They will identify unsafe work practices and see that each subcontractor is following the jobsite safety program. Superintendents will hold orientation meetings as needed, meet weekly in the safety meeting, and will conduct weekly safety inspections. Superintendents and Project Managers will support each other to see that safety matters are addressed quickly and effectively. Detailed information regarding Superintendent and Project Manager Safety responsibilities are also provided in the section outlining Superintendent and Project Manager Job Site Safety and Risk Control Responsibilities.

Project Engineer: Maintains the project documentation and reports so they are neatly organized and accessible. Project Engineers will provide direct support to the Project Manager and Superintendent as requested.

PROJECT START-UP CHECKLIST – SAFETY ITEMS

At the beginning of each project a number of items are needed in order to create an organized, safe work environment which complies with requirements from various federal, state and local agencies. The following safety items must be ordered and/or maintained in the construction trailer/office during the course of the project.

PROJECT TEAM ITEMS

1. Zwick Construction Company Safety Program Manual
2. Required EPA Permits/SWPPP Manual (see Civil Engineering Consultant)
3. First Aid Kit and Service for jobsite
4. Adequate fire extinguishers for the project trailer, Zwick-issued vehicles and jobsite structures (10 lbs. ABC)
5. Emergency contact information posted at each phone location
6. A posted map to the nearest medical facility at each phone location
7. Adequate toilet facilities
8. Adequate trash receptacles
9. PPE required for every person on site, including High visibility (safety) clothing or vests
10. Tool box meetings – conducted weekly
11. Safety forms
12. State and Federal Posters
13. Safety Orientation Hardhat Stickers
14. Construction OSHA Regulations (CFR 1926) (electronic version online)
15. Jobsite safety signs per Zwick Safety Sign Package

STANDARD FIRST AID SUPPLIES

Every project and Zwick vehicle is to have a First Aid kit. The items listed below are the basic components to be maintained in the first aid kit. No medications are stored in the first aid supplies.

FIRST AID CABINET AND SUPPLIES:

- Multi-Shelf Cabinet
- CPR/First Aid Sign for trailer (if not part of the safety sign package)
- First Aid Sign for Trailer (if not part of the safety sign package)
- Anti-Bacterial Wipes
- Antiseptic Swabs
- Flex Corban Wrap
- 3-in-1 Antibiotic Ointment
- Particle Masks
- Antiseptic Spray
- CPR Protective Airway Mask/Mouth Barrier
- Infection Control Kit
- Sheer Strip Bandage 1" 100ct/Box
- Triangular Bandage
- Burn Septic Spray
- Water-Gel Burn Gel 25ct/box
- Tape Spool 1" x 10 yards
- Roller Gauze 2" x 4.5 yards
- Plastic Eye Wash Cups / 6 Vials
- Compression Bandage
- Eye/Skin Buff Flush Solution 8 oz.
- Finger Splint 12 pack
- Finger Tip x Large Bandage 25ct/Box
- Latex Gloves 5 pairs vital
- Knuckle Bandage 40ct/Box
- Disposable Tweezers
- Scissors 4" Ground Blades
- Gauze Pads 3" x 3" 25ct / box
- Hand Cleaner/Sanitizer

PERSONAL PROTECTIVE EQUIPMENT POLICY

The purpose of this section is to explain how personal protective equipment is to be managed on all projects. Topics include hard hats, gloves, safety glasses, footwear, safety vest / clothing and hearing protection.

HARD HATS

Zwick Construction takes hard hat use very seriously and strives to set high standards for safety on all our jobsites. Hard hats must be worn by all employees entering and/or working on a 100% of the time. Hard Hats must be worn with the bill forward unless approved by the Safety Director. Welders and Surveyors are authorized to wear their hard hats with the bill facing backward while performing their specific work tasks as long as the suspension is facing in the proper direction.

GLOVES

Zwick Construction understands the importance of hand protection. Gloves are to be worn by all employees performing work that is potentially hazardous to their skin or hands. Because of the large variety of hazards, the proper selection of gloves is to be determined by the Project Superintendent, Project Manager or Safety Director.

SAFETY GLASSES

Zwick Construction requires the use of safety glasses by all employees at all times while on the job site. Employees wearing corrective eyewear / glasses are required to wear Z87.1 rated eye protection with side shields.

FOOTWEAR

Zwick Construction requires the use of proper footwear by all employees at all times while on the job site. Boots will extend six inches above the sole. Selection of work boots or protective footwear is to be determined by the Project Superintendent, Project Manager or Safety Director.

SAFETY VESTS / CLOTHING

Zwick Construction requires that bright colored safety clothing or vests are to be worn by all employees working outside where heavy equipment and machinery are operating. This will improve the visibility of each individual allowing the operators to work safely.

Follow these procedures 100% of the time when wearing and using any PPE you are authorized to wear and use.

- Personal protective equipment must be used when an exposure warranting the equipment exists.
- Personal protective equipment must be maintained in a clean and sanitary condition

and in good working condition at all times.

- All employee-provided personal protective equipment must be inspected by a supervisor and approved before the employee is allowed to wear the equipment.
- All personal protective equipment must be inspected on a regular basis to ensure that it is in good working condition.
- Personal protective equipment should never be altered from the original condition or used for purposes for which it was not intended.
- Clothing must be considered a form of personal protective equipment and must be selected on the basis of the job or task being performed. A work type boot is required at all times. Loose clothing is prohibited. Clothing must also be adequate to protect against the elements of weather and other exposures.
- Report any malfunctions or deficiencies in personal protective equipment to a supervisor immediately.
- Know the uses and limitations of any personal protective equipment before use.
- Read the manufacturer's recommendations before using any personal protective equipment.

PERIMETER FENCE POLICY

A perimeter fence shall be installed prior to work commencement and shall be maintained throughout the course of the project. Appropriate signage must be installed and maintained as directed in the Safety Signage Section. The fence will help control access to the project for authorized employees as well as limit access by unauthorized employees or as an attractive nuisance. (An attractive nuisance is a potentially harmful object that is so inviting or interesting to a child that it would lure the child onto the property to investigate.)

SECURITY

When needed, the use of outside security services may be contracted to control access to the site. This may be used to protect property loss and/or unauthorized entry.

VIDEO SURVEILLANCE

The use of video surveillance cameras during the construction of our projects requires signage alerting of its use. Refer to the Section regarding *Picketing Response Guidelines*.

As conditions warrant, screens may be installed over the perimeter fence to obscure or prevent visual inspection of the construction site.

PHASING AND SITE SEPARATION

During the acceptance of phased work, temporary fencing must be erected at all road or parking areas or entry points to the construction area. This applies to either direct access from the road or at any and all driveway entry points of the project in which construction and owner operations co-exist. The barriers must be maintained on a daily basis and moved as the project progresses and as buildings continue to be occupied or accepted by Owners. Signs must be posted on all temporary fencing and barricades indicating "Danger Construction Area – Keep out". All perimeters of the construction site which are readily accessible by the public or others not associated with construction must be protected by a temporary fencing and visible warning signs must be posted.

VISITOR POLICY

Employees are required to obtain prior approval from their Zwick Construction Project Superintendent before inviting any visitor or vendor to the project. All visitors and vendors are subject to all Zwick Construction site-specific safety requirements.

CONSTRUCTION STANDARD SAFETY SIGN PACKAGE

All employees are required to abide by all safety and warning signs while working on any Zwick construction project.

Obey all signs and warnings.

Never remove, alter or move any sign or warning unless requested to do so by your project Superintendent.

If you observe a sign that is defective or damaged or has fallen, contact your project Superintendent immediately.

Below are the standard signs shipped to each project at start-up and their recommended placement locations. If you feel that additional signs are needed, Contact your project Superintendent.

- **Danger/No Trespassing:** Located approximately every 100' on exterior perimeter security fence.
- **No Smoking:** Located at entrance of each building under construction, fuel or fire hazard areas and at entrance to construction office.
- **Field Office:** Located at entrance to Zwick construction office.
- **Visitors:** Located at primary and secondary entrances or gates. Install in such a manner that it is visible when gates are open for business.
- **Personal Protective Equipment (PPE) Required:** Located at primary and secondary entrances or gates. Install in such a manner that it is visible when gates are open for business. Additional signs as needed to warn or remind people of PPE use.

SUBCONTRACTOR SAFETY POLICY

All Zwick Construction subcontractors are required to abide by the Zwick Project site-specific Safety Requirements 100% of the time they are working on a Zwick project. If you observe any subcontractor failing to abide by the site-specific safety requirements, contact your Project Superintendent immediately.

ACCIDENT / INCIDENT INVESTIGATION & REPORTING

Zwick Construction investigates all work-related accidents and near-miss incidents. All employees are required to report any of the following incidents immediately to their Superintendent/ Project Manager:

1. Any accident or incident resulting in injury or illness of any magnitude, which occurred on a Zwick Property, or while working on Zwick Company time.
2. Any accident or incident resulting in property or equipment damage of any magnitude that occurred on Zwick property.
3. Any "Near Miss" incident that could have potentially resulted in a serious injury or illness to a worker.
4. Zwick employees involved in accidents or injuries are required to be drug tested immediately.
5. Employees are required to use the medical providers designated by Zwick Construction for their initial medical visit or consultation following any on-the-job injury.
6. Employees who are involved in any on-the-job injury are required to accept any temporary transitional duty job that is prescribed by their treating physician.
7. Employees involved in any accident or injury is required to complete an employee accident report form as soon as possible following the accident or injury.
8. Employees involved in any accident or injury is required to cooperate with Zwick personnel conducting the accident investigation.
9. Zwick employees who are witnesses to accidents and injuries will be required to complete a witness report and will also be required to cooperate with any Zwick personnel conducting any accident investigation they are witness to.
10. All Zwick employees who are on site when an accident or injury occurs are required to cooperate with the Project Superintendent and to assist in the response or investigation if requested to do so by the Superintendent. However, if you are not directly involved in the accident or injury or in the investigation or response, stay away from the area of the accident or injury and do not get in the way of first responders or those involved in the accident or injury.

Accident / Incident Reporting

Employees who are involved in any work related accident or injury are required to complete the Zwick Accident / Incident report form as soon as they are capable or instructed to do so by their Superintendent or by the Safety Director.

OSHA INSPECTIONS

It is possible that either an OSHA Compliance Officer or an OSHA Consultation Officer may inspect a project where you are assigned and working.

If you are not requested to participate in any OSHA inspection either by the Project Superintendent or the OSHA Officer, do not participate in the inspection. Continue to perform your job tasks in a safe manner.

If approached and/or requested by the OSHA Officer to participate, you are allowed and required by law to participate in the inspection. By law, you are allowed to answer questions posed to you by the OSHA officer.

You are required by Zwick to be courteous and polite to the OSHA officer.

If requested to participate in the inspection by the Project Superintendent, you are required to participate.

CRISIS MANAGEMENT PLAN

The Crisis Management Plan promotes the ability to respond to a crisis or catastrophe event in a planned, organized, and timely manner.

Crisis – Any incident that stops an entire project's production activities, which is a result of personal injury or property loss.

PROJECT TEAM PROCEDURES

A. TAKE CHARGE OF THE DISASTER SITE OR LOCATION

Without placing yourself or others in danger:

1. Call 911 – Care for the injured.
2. Contact the Safety Director and Project Manager.
3. Contact the Project Executive.
4. Notify your subcontractors and advise them of the situation.
5. Secure the site using fences or barricades as appropriate at all entry points.
6. Put key personnel at controlled access points to the project to direct emergency personnel.

B. GET THE FACTS

1. Secure all files and materials.
2. Determine what other Zwick and emergency personnel need to be contacted to assist in addressing the situation.
3. Seek and/or obtain documents and materials from others as necessary to provide complete and accurate information which will assist informed decision making.

C. INVESTIGATE AND PRESERVE EVIDENCE

1. Any investigation must be coordinated in conjunction with our Safety Director and legal counsel.
2. Take necessary steps to lock up, guard, and/or photograph important items. Take steps to avoid the alteration or destruction of crucial evidence.
3. Videotape/take pictures of all investigation evidence.
4. Save and safely store samples of failed components or representative materials for later testing.

D. COOPERATE CAUTIOUSLY WITH OTHERS

Provide cordial, yet cautious, cooperation to design professionals, subcontractors, suppliers, insurers, claims representatives, and investigators who do not represent enforcing authorities. Refer all substantive questions to our legal counsel.

E. DEALING WITH THE MEDIA

In a crisis situation, media and press representatives will try to obtain a comment or statement from you. If you are approached by members of the media, you must direct all media inquiries to the Safety Director, CEO, CFO or VP of Zwick Construction.

If pressed for a response – especially to “yes or no” questions, please respond courteously:

“It’s too early to comment on any details until we have accurate information.”

“My only goal at this time is to account for the safety of all personnel. Our company spokesperson will be onsite shortly, and once we have accurate information we’ll share it immediately.”

G. PROTECT AND INVESTIGATE USING ATTORNEY-CLIENT PRIVILEGE AND WORK PRODUCT DOCTRINE.

1. Use attorneys whenever possible to obtain facts or conduct investigations.
2. Identify all written communications relative to the crisis with a stamp indicating “Confidential/Legal” or similar legend.
3. Maintain separate, segregate files in a restricted access area. Do not duplicate files or make copies of correspondence.

THE CRISIS MANAGEMENT TEAM

The Crisis Management Team is composed of the following individuals:

- Chairman. The Chairman heads the overall crisis management team and is located in the main office. They provides guidance to the Divisional Leaders and Site Leader(s) while, in most cases, staying removed from the distraction and disruptions of the disaster site; coordinates corporate office functions in support of the site team, specifically legal, insurance, media, and outside professionals; maintains stability and control over the other ongoing business functions.
- Insurance/Financial Coordinator. The Insurance/Financial Coordinator supports the Chairman in his functions; initially contacts appropriate company insurance personnel; establishes and coordinates necessary office staff and functions to support the Crisis Management Team.
- Site Team Leader(s). Upon notification, Site Team Leaders immediately go to the project site. The senior Site Team Leader takes charge of the crisis activities when they arrive on site.
- Legal Coordinator. The Legal Coordinator provides legal support to the Chairman; con-

tacts and hires outside legal counsel if necessary; and interfaces with Zwick Construction's actions and activities relevant to the crisis.

RESPONSIBILITIES

A. PROJECT MANAGER'S RESPONSIBILITIES

The Project Manager sets the Crisis Management Plan in motion by calling all emergency services and Crisis Management Team members, in order of importance.

1. Dial 911 for emergency service(s).
2. Secure the site by protecting all possible points of entry.
3. Contact the Safety Director Project Executive.
4. Contact the Site Leader(s).
5. Contact the main office.
6. If the crisis occurs after work hours, mobilize your staff off site.
7. Follow all directions of local authorities at all times.

B. SITE TEAM LEADER(S) RESPONSIBILITIES

1. Contact the Safety Director with updated information as necessary.
2. Coordinate with local authorities and assist when necessary.
3. Provide Site Team Leaders with information and coordination of activities.
4. Provide information to legal counsel as necessary.

C. CONSTRUCTION SUPPORT SERVICE ACTION PLAN

The crisis site is the focal point for disseminating information during a crisis. The Crisis Management Team also holds important responsibilities and should take the following steps:

1. Brief all Executive Committee personnel as soon as possible.
2. Contact legal counsel.
3. Direct all media inquiries to the main office and spokesperson.
4. Brief the necessary office personnel of the situation
5. Designate Zwick Construction's Main Office as the main point-of-contact and switchboard for all communications.
6. Respond immediately to the site location if necessary.

FIRE PROTECTION PLAN

Make sure you know and understand the project emergency response procedures. If you have any questions regarding the emergency response procedures for the project where you are assigned, contact the Zwick Project Superintendent.

- Always follow the emergency response procedures for the project where you are assigned or working.
- Only authorized and trained employees may operate any fire-fighting equipment including portable fire extinguishers. If you have not been specifically authorized to operate a particular piece of firefighting equipment including a portable fire extinguisher, do not operate this equipment.
- If you observe a fire anywhere on the project, report it immediately to your Project Superintendent
- If you observe any contractor working on the project working in an unsafe manner or in an unsafe condition, notify your Project Superintendent immediately.
- If you observe that flammable or combustible liquids are not being stored or handled in a safe manner, contact your Project Superintendent immediately.
- If you observe any area on the project where poor housekeeping is being practiced by any contractor, contact your Project Superintendent immediately.
- Smoking is allowed only in designated areas on the project. Only smoke in these areas. Discard spent cigarettes in a safe manner and in the designated receptacle for spent cigarettes. Please note that some projects may ban smoking site-wide for all personnel.
- Smoking is never allowed in any toilet or outhouse on the project
- Smoking is never allowed in the Zwick job site trailer.
- Know the location of all portable fire extinguishers.
- A clear path should be maintained to all portable fire extinguishers. If you observe that the path to any portable fire extinguisher is blocked, contact your Project Superintendent immediately.
- All portable fire extinguishers must be fully charged. If you observe any portable fire extinguisher on the project that is not fully charged, notify your Project Superintendent immediately.
- If you feel that additional portable fire extinguishers are needed, contact your Project Superintendent immediately.

DRUGS, ALCOHOL, AND OTHER PROHIBITED ITEMS

STATEMENT OF PURPOSE

The Zwick Construction policy on drugs, alcohol, and other prohibited items promotes a work environment free of the use of illicit drugs, controlled substances and alcohol. All employees are required to abide by the Zwick Substance Abuse Policy for the following purposes:

To secure a safe, healthful, and productive work environment for the employees of the Company and others on Zwick property.

- To promote and maintain a positive public image.
- To maintain the highest standards within the construction industry.
- To protect Zwick property and assets and to ensure efficient operations.

Employees who abuse alcohol or drugs are a danger to themselves, to other employees and the productive work environment. Employees have the right to work in an alcohol and drug-free environment and to work with persons free from the effects of alcohol and drugs.

If you have any questions regarding the Zwick Substance Abuse Policy, contact your Project Superintendent or Project Manager immediately.

VIOLENCE PREVENTION PLAN

Zwick Construction has a zero-tolerance policy for workplace violence. Workplace violence is any act of physical violence, threats of physical violence, harassment, intimidation, or other threatening, disruptive behavior, that occurs on the jobsite. It may be physical and/or verbal. It is critical to ensure that all employees know the policy and understand that all claims of workplace violence will be investigated and remedied promptly.

We categorize workplace violence in three categories, which will result in different penalties, up to, and including immediate termination.

Level I: Disruptive behavior including, but not limited to, verbal abuse, shouting, harassment, bullying, intimidation, obscene language or gestures, or making false statements.

Level II: Aggressive or threatening behavior including, but not limited to, threatening with an object, verbal threats of assault, obscene or threatening calls, being followed or stalked.

Level III: Physical assault including, but not limited to, pushing, grabbing, hitting, striking with an object, throwing items, sexual assault, stabbing, shooting, or homicide.

PREVENTION

In an effort to help reduce or eliminate any incidents of workplace violence, any concerns about safety or security, are to be reported to the Safety Director or site management immediately. The following is a list of indicators that will help identify the risk of potentially violent employees.

- Sudden and persistent complaining about being treated unfairly
- Blaming of others for personal problems
- Sudden change in behavior, deterioration in job performance
- Statement he or she would like something bad to happen to supervisor or another co-worker
- Paranoid behavior
- Sudden increased absenteeism
- Sexually harassing or obsessing about a coworker: sending unwanted gifts, notes, unwanted calling, stalking
- Talking to oneself
- Poor relationships with employees or management
- Previous threats, direct or indirect
- Carrying a concealed weapon or flashing one
- Refusal to accept criticism about job performance
- Sudden mood swings, depression
- Sudden refusal to comply with rules or refusal to perform duties
- Inability to control feelings, outbursts of rage, swearing, slamming doors, etc.

If anyone is found demonstrating one or a combination of the listed indicators, Zwick Construction is to be notified. If you notify Zwick Construction of any concerns you shall remain anonymous.

RESPONSIBILITIES

1. Zwick Construction employees are to enforce the violence prevention program for all on-site work throughout the duration of the project. If an actual or potential workplace violence incident is reported, Zwick Construction is to follow the reporting procedures outlined in this safety manual.

RESPONSE PROCEDURES

If a threatening situation arises, remain calm and remove yourself from the situation as soon as possible. Immediately call for assistance, or designate others to call for assistance from an appropriate source (e.g. Safety Director, supervisor, superintendent, police, or emergency personnel). Notify others to seek safety if danger is imminent and poses a threat to them.

If you are a victim or witness to a violent incident while working onsite, immediately report the events and the responsible party to a Safety Director, Supervisor or Zwick representative. Your identity will remain anonymous where protected by law. An investigation will take place and appropriate measures will be taken to prevent future occurrences. The guilty party will be warned or asked to leave the jobsite based on the level of workplace violence and the imminent threat they pose to the safety of those working on site. If needed notify proper law enforcement.

REPORTING PROCEDURES

In the event of a workplace violence incident the Workplace Violence Incident Report Form is to be filled out by the victim or by a witness to the incident. The form is to be turned in to the Zwick Safety Director or Project Executive. In the case of a Level III incident, local law enforcement authorities will be immediately involved. All witnesses are to be listed on the report in the case that more information is required in the investigation process. Level III incidents may result in criminal charges, therefore, the investigation will be handled by law enforcement and the cooperation of all involved is required.

SAFETY PROGRAM ANALYSIS AND REVIEW PLAN

The Safety Department of Zwick will periodically review the elements of this safety and health program to ensure effectiveness and continued implementation. The analysis and review process attempts to identify any deficiencies or failure in each element. The desired result is corrective measures or adjustments to elements that have deficiencies or failures attributed to them.

The analysis and review process is conducted at intervals not exceeding annually. In some cases, it may be necessary to review a particular element or process more frequently, especially if the program is new or recently implemented. Increases or fluctuations in work related injury and illness rates may also constitute review or revision of certain program elements.

Changes to this program will be communicated to all employees of the company.

FALL PROTECTION PLAN

Employees must first be authorized to perform any work that requires the use of fall protection equipment.

All employees who are authorized to perform work requiring the use of fall protection equipment must receive fall protection training prior to performing this work. Zwick employees are encouraged to suggest alternative methods of performing assigned tasks that do not require the positioning of the employee in a manner that exposes them to situations that would require the use of fall protection equipment, if such methods can be reasonably achieved. Fall protection is to be used for any activities at six feet or above the closest floor or surfaces below.

Zwick employee must be trained in the proper care and use of all fall protection equipment used by Zwick Construction.

Any fall protection equipment must incorporate, but not be limited to, the following:

- Adequate Anchorage Point (5000 lbs. or 2x intended load)
- Approved Body Harness (check expiration dates of equipment)
- Approved Deceleration Lanyard
- Approved Rope Grab
- Approved Rope/Lifeline

Always check expiration dates of equipment before using.

Additional Information:

- Fall protection requirements are defined by OSHA in CFR 1926.500-503, Appendix A-E and must be reviewed prior to the use of fall protection equipment.
- Contact the Zwick Safety Director for additional training and information.

CONTROL OF HAZARDOUS ENERGY PLAN (LOCKOUT – TAG-OUT)

The purpose of this lockout/tag-out program is to prevent injury and/or death to employees by requiring that certain precautions be taken before servicing/repairing machinery or equipment with a live energy source.

GENERAL LOCKOUT/TAG-OUT GUIDELINES

- Only authorized and qualified personnel are allowed to service or repair machinery or equipment. (Only licensed electricians should work on any electrical devices or circuit boxes.) If you are not specifically authorized to service or repair machinery or equipment, do not engage in any activity related to servicing or repairing machinery or equipment.
- Never attempt to perform service/maintenance or remove a safety guard from machinery or equipment unless all energy sources have been turned off and disconnected from the energy source to prevent accidental start-up.
- Never start machinery or equipment without checking to ensure that areas around equipment are clear.
- Do not start any machine or equipment that is tagged or marked with “DO NOT USE” or other similar messages.
- Do not remove any lock, tag, sticker or other similar sign that has been placed on equipment unless specifically authorized to do so.

TRAINING

All employees who are responsible for following this procedure must become familiar with the elements of this program. This will consist of the following:

1. Recognition of applicable hazardous energy sources
2. Details about the type and magnitude of hazardous energy sources present at the workplace.
3. Methods and means necessary to isolate and control those energy sources.

ENFORCEMENT/INSPECTION

It is the responsibility of each employee to adhere to all safe work practices pertaining to the control of hazardous energy. The Project Manager will be enforcer of this program. Those employees found to be in violation of this program will be subject to disciplinary actions.

PROCEDURES

1. Consider the effects of taking the device offline, including loss of lighting, loss of proper ventilation, etc., and mitigate the effects.
2. Prepare to shut down device. Notify all affected personnel.

3. Any mechanical or electrical device that creates a hazard or has the potential to create a hazard must be shut off, de-energized and locked and tagged “DO NOT USE” or similar messages.
4. All tags or signs should be securely attached, dated, and signed by the person performing work.
5. Any device that can be locked out should be locked out. All keys are the responsibility of the Zwick Superintendent.
6. All devices that have been locked out should be tried again to make sure lock is secure and energy source has been isolated.
7. All lockout/tag-out devices must remain in place until work has been completed.
8. Upon completion of work all locks and tags should be removed.
9. No equipment should be started until all employees are clear of hazards.

START-UP PROCEDURES

1. Inspect the work area to ensure that non-essential items have been removed from machinery and equipment.
2. Check the surrounding area around machine or equipment to ensure that all affected personnel are safely positioned or removed.
3. Make sure that lock or tags are removed only by those who attached them.
4. Notify affected personnel after removing locks or tags and before starting equipment.

CONFINED SPACE ENTRY PLAN

Any Zwick employee performing work related duties that require entry into confined spaces must be authorized to enter confined spaces and trained in the requirements of this Confined Space Program. If you are not authorized to enter or work in any confined space, do not enter or work in a confined space.

A confined space is defined as a space that,

- is large enough and so configured that an employee can physically enter and perform assigned work
- has limited or restricted means for entry or exit, and
- is not designed for continuous employee occupancy

There are two types of confined spaces as defined by CFR 1910.146.

1. Permit Required Confined Spaces
2. Non-permit Confined Spaces

A permit required confined space means a space that has one or more of the following characteristics:

1. Contains or has the potential to contain a hazardous atmosphere
2. Contains a material that has the potential to engulf the entrant
3. has an internal configuration such that a person could be engulfed or asphyxiated.

Zwick employees are not allowed to enter a Permit Required Confined Space as defined above.

A non-permit confined space means a confined space that does not contain or have the potential to contain a hazardous atmosphere or contain any hazard capable of causing death or serious physical harm. (An example of a non-permit confined space would be an attic).

The following precautions should be taken prior to entering a non-permit confined space:

1. All entrants must be trained and knowledgeable in the indemnification of confined spaces.
2. The directions of the supervisor must be followed at all times.
3. Communication must be maintained at all times with outside party.
4. Entrant must know emergency procedures and evacuation route.
5. Utilize all necessary personal protective equipment required by the duties involved in

the confined space.

6. Never attempt to rescue a person in a confined space unless authorized or knowledgeable in emergency procedures associated with this.
7. Evacuate the confined space at the first sign of problems or newly identified hazards.

HAZARD COMMUNICATION PLAN FOR GLOBALLY HARMONIZED SYSTEM (GHS) MATERIALS

The Hazard Communication Program outlines the Zwick Construction policy on hazardous materials. It describes how we identify and label hazardous materials; outlines methods to inventory and report materials on the job site; provides guidelines for handling dangerous chemicals; and describes our training program and documentation.

STATEMENT OF PURPOSE

Zwick Construction is committed to provide a safe working environment for our employees, subcontractors, and suppliers. To do this, all individuals must be aware of physical and chemical hazards on the job site and know safe-handling procedures for hazardous materials. Our managers must also know and carry out the Company's responsibilities under federal and state guidelines. This policy and the accompanying procedures are designed to ensure the health and safety of all concerned.

POLICY STATEMENT

It is the policy of Zwick Construction to perform work in the safest manner possible, consistent with good construction practices. In order to conduct our business, we must use certain materials that require specific precautions to be taken to protect our employee's health. The Federal Hazard Communication Standard will serve as minimum guidelines for Zwick Construction's Hazard Communication Program. Where state or local jurisdictions have more stringent Hazard Communication or Right-to-Know laws, Zwick Construction will comply with these. It is the policy of Zwick Construction to communicate any hazards associated with handling hazardous materials to employees involved in those operations.

Zwick Construction will not discriminate against any employee for requesting information on a toxic or hazardous substance found in his/her work area, or refusing to work with a particular substance when the company has been unable to provide that employee with a Safety Data Sheet (SDS) for the substance in question, or has failed to demonstrate a diligent effort to obtain the SDS for that substance.

RESPONSIBILITY

Unless notified otherwise, the Project Manager is the person responsible for implementing this written program and insuring that the requirements listed herein are met.

It is the responsibility of management and supervisors to ensure that the proper information is obtained and disseminated to the appropriate employees. It is the employee's responsibility to follow safe practices as outline in the SDS or established operating procedures outlined in training.

IDENTIFYING HAZARDS

The effectiveness of the Hazard Communication Program is largely dependent on the adequa-

cy and accuracy of the hazard assessment.

REFERENCE REPORTS LIST

OSHA divides chemical hazard into two broad categories: physical hazards and health hazards. Physical hazards are presented by combustible, flammable, or explosive, chemicals, reactive or unstable chemicals and compressed gases. Health hazards are posed by carcinogens, mutagens, or teratogens, toxic and highly toxic agents, or irritants. Chemicals that are listed in one of the following sources are to be considered hazardous in all cases.

- 29 CFR 1910, Subpart Z, Toxic and Hazardous Substances, Occupational Safety and Health Administration (OSHA)
- Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment, American Conference of Governmental Industrial Hygienists (ACGIH)
- In addition, chemicals that have been evaluated and found to be a suspect or confirmed carcinogen in the following sources are to be considered as hazardous chemicals.
- National Toxicology Program (NTP), Annual Report on Carcinogens
- International Agency for Research on Cancer (IARC), Monographs
- 29 CFR 1910, Subpart Z, Toxic and Hazardous Substances, OSHA

SAFETY DATA SHEETS (SDS)

As a user (rather than a producer) of hazardous chemicals, Zwick Construction relies upon the hazard determination of chemical manufacturers provided through the Safety Data Sheets (SDS). A SDS is a document that supplies information about a particular hazardous chemical.

The SDS provides information on the physical and chemical characteristics of the hazardous chemical; known acute and chronic health effects and related health information; exposure limits; whether the chemical is considered to be a carcinogen by NTP, IARC, or OSHA; Precautionary measures; emergency and first aid procedures; and the identification of the organization responsible for preparing the sheet, including name, address, and telephone number.

ASSESSING HAZARD

As stated above, Zwick uses the Federal Hazard Communication Standard as minimum guidelines for our Hazard Communication Program. Where state or local jurisdictions have more stringent Hazard Communication or right-to-know laws, Zwick Construction complies with these.

For each project, Zwick management identifies applicable guidelines and assesses physical and chemical hazards to ensure that any potential hazards that may be created will be properly controlled. This assessment includes such factors as possible confined space use, ventilation availability, and nearby work activities that may affect or be affected by the use of the chemical.

At this time, management determines the appropriate engineering controls, work practices, personal protective equipment, and fire control procedures.

COMMUNICATING HAZARD

Zwick will maintain the following documents and files on project hazards to support our Hazard Communication Program.

- Safety Data Sheets. Zwick will make available at the job site (or immediately available) a SDS for all hazardous chemicals on site.

Management reviews incoming SDS's for new and significant health/safety information, and, if necessary, this information is passed on to affected employees and all subcontractors on site before the hazardous chemical is used. If a SDS is missing or obviously incomplete, management requests a new SDS from the supplier or manufacturer. Management notes on the inventory form the date the SDS was requested and received.

- Subcontractors' SDS. All subcontractors have contractually agreed to provide the Zwick project office with a complete set of SDS's applicable to their operations and update them as necessary to ensure a current project SDS file.

Copies of the documents will be kept at the project office and made available for review by employees, subcontractor's employees, and other authorized individuals during normal working hours.

CHEMICAL LABELING

Labels are designed to provide information to employees concerning the hazards of various chemicals. Therefore, it is important that hazardous chemicals are not placed in improperly labeled containers. Zwick employees will follow these procedures to ensure safe handling of chemicals.

1. All manufacturers' labels are to be left on the original containers.
2. Each container of hazardous chemicals, regardless of size, is to be labeled. The label is not to be removed and should be replaced if discovered to be illegible or missing.
3. As a minimum, each label must contain the following:
 - a. Identification of material in the container;
 - b. Name, address, and telephone number of chemical manufacturer, importer, or the responsible party (applies only to manufacturers' labels) of the materials;
 - c. Appropriate hazard warnings, such as health, fire, and reactivity.
4. Employees having the potential of coming into contact with hazardous chemicals will be trained in the interpretation of the specific labeling system in use at the project.
5. Pipes do not require labeling.

6. In storage areas where similar chemical products are stored all individual containers must be labeled.
7. In those cases where a chemical product other than that specified on the container label is placed in the container, the container is to be relabeled to accurately reflect the contents and hazards of the chemical product that has been substituted.
8. The labeling system will consist of the following types of labels:
 - a. The original manufacturer's label; or
 - b. Written words indicating the contents and hazard (e.g. GASOLINE – FLAMMABLE);
or
 - c. Commercially-available warning labels
9. Zwick will conduct periodic checks to ensure all containers of hazardous chemicals are properly labeled.

TRAINING

Zwick will provide training in the use of hazardous materials in accordance with the written training guidelines to the following individuals:

- New employees who may be exposed to hazardous chemicals furnished by Zwick under normal working conditions or during a foreseeable emergency.
- Current employees who were transferred or reassigned to a new workplace with a different set of hazards.
- Current employees who are exposed to a new hazard introduced into the workplace.

When a new chemical is introduced to the site, management reviews the SDS at a safety meeting or with the employees that will be exposed. All continuous training will be documented.

ANNUAL REVIEW

The Zwick Construction will review the details of the Hazard Communication Program annually and implement any necessary changes.

NON-ROUTINE HAZARDOUS TASKS

Periodically, employees are required to perform non-routine hazardous tasks. Before starting work, the Project Manager will conduct a meeting with the affected employees to ensure that they are familiar with the hazards associated with the chemical(s) and the proper protective measures to be taken.

RECORDS OF ACCIDENTAL OVER-EXPOSURE

In addition to inventory, Zwick will maintain all SDS, and training records, and will keep a re-

cord of any employee who has been accidentally over-exposed to a hazardous chemical.

SAFETY DATA SHEET

Zwick maintains a largely supervisory workforce. Our employees are rarely in direct contact with hazardous substances. However, any hazardous substances brought on to the jobsite by Zwick or used by Zwick personnel will be included in this section of the Hazardous Communication Program.

INCLEMENT WEATHER PLAN

Inclement weather can strike at any moment and comes in many forms (such as tornadoes, sand storms, wind storms, blizzards, etc.). All projects must be prepared in the event that bad weather strikes their area.

If inclement weather threatens your work environment, immediately notify the project superintendent. If the Project Superintendent advises you to take shelter or evacuate the premises, then abide by his or her directions.

The procedures below should be performed by the Project Superintendent.

Follow the directions of any and all public service announcements and any direction given by local authorities. Begin preparing as soon as an announcement is made.

- Contact your regional office and notify them of your situation and any additional support needed.
- Secure the site. Tie down any loose objects that might be blown or create additional hazard. Make sure trailers are secure.
- Back up all computer data and store in a safe place.
- Unplug computers, phones and other electrical devices, and secure them in a closet or interior space. Any additional office equipment or loose object should also be stored.
- Turn off all gas, water and electricity to job trailer and construction area as needed.
- Close and lock all doors and gates.
- Evacuate the project and account for all site personnel.

In the event a crisis develops as a result of inclement weather, see Crisis Management Plan.

In the event that time does not allow for site preparation, protect yourself and find shelter. Do not stay in trailers or vehicles during tornadoes or high wind situations. Find a secure area free of windows or areas where airborne objects could strike you.

EARTHQUAKE PLAN

Earthquakes strike without warning and may range in intensity from slight tremors to major events. They may last only a few seconds or several minutes. After a major earthquake, “aftershocks”, generally less violent, should be anticipated. The great majority of injuries experienced in earthquakes are the result of employees being hit by falling objects. Therefore, it would be extremely dangerous to rush outside immediately, where considerable falling debris might be encountered.

DURING AN EARTHQUAKE:

1. Keep calm. Do not run or panic.
2. Move away from windows toward the center of the building.
3. Take cover under desks or tables in doorways or against inside walls.
4. Stay away from tall objects, such as filing cabinets.
5. Stay away from windows or doors. Do not run out of doors.
6. In an elevator, exit at the nearest floor.

AFTER THE EARTHQUAKE:

1. After the quake, assemble your team and determine the extent of the project damage and any necessary action needed. Consider the following:
 - a. Prepare for additional aftershocks.
 - b. Structural failures/collapse of roof, upper floors, walls, and structures.
 - c. Energized downed power lines, damaged wires, short circuits.
 - d. Tank and piping failures such as flammable or combustible liquids.
 - e. Broken gas lines and electrical wiring faults that might cause a fire or ignite.
 - f. Shut off all valves to water, gas and disconnects to electrical power.
2. Have all subcontractors on site report and account for their personnel.
3. Contact the Safety Director and communicate your status.
4. Follow all directions of local authorities.
5. Do not use elevators.

6. Stay away from adjacent buildings and stay clear of any power lines, poles or other items that might easily topple.

BOMB THREAT PLAN

Any employee could receive a bomb threat. It is vital not to react with shock or panic. Use your wits and be alert.

If it's an active situation, keep the person talking as long as possible. Grab a pencil and paper. If possible, record what is said, plus your impressions. Listen!

Ask questions. Get him to repeat what he said. Above all, do not hang up or transfer the call. Do not consider it a hoax or joke.

Try to obtain information about the location of the bomb and the intended time of detonation. Think: Who, what, when, why, where and how.

When is it set to go off and the location - **“when” and “where.”**

Try to get as many distinguishing features about the caller as you can. Here's a checklist.

1. Time and date of call.
2. Information given by the caller (i.e., where bomb is placed, when is it set to go off, where it was placed, what type of bomb is it, etc.).
3. Type of voice (loud, soft, raspy, high-pitched, low-pitched, pleasant, intoxicated, and slurred).
4. Caller's manner of speaking (calm, angry, rational, irrational, coherent, incoherent, emotional, laughing).
5. Speech (fast, slow, distinct, distorted, stuttering, nasal, lisping).
6. Background noises (factory sounds, machines, motors, trains, bedlam, animals, music, quiet, office machines, voices, planes, public-address system announcements, party atmosphere, etc.).
7. Caller's identity (male, female, adult, juvenile).
8. Language (excellent, good, fair, poor, abusive, foul).
9. Accent (localized, ethnic, foreign).

UPON DISCOVERY OF A SUSPICIOUS OBJECT

1. Get all affected personnel off the project.
2. Notify the Police Department/Bomb Squad immediately by dialing 911.
3. Ensure the nothing is touched or moved on site.
4. Set up control access points on the project away from the affected area until relieved of

responsibility or given further instructions.

5. Follow all directions of local authorities.
6. See Crisis Management Plan.

GENERAL SAFETY RULES AND WORK PRACTICES

Below are general safety rules and good work practices to be followed on every job site.

- Safety to employees comes first at all times.
- Employees will never be expected to perform duties or tasks that put them or others at risk.
- Employees must report any and all injuries and illnesses, damage to machinery or equipment, near miss incidents, identified hazards and unsafe conditions in the work place to their Supervisor immediately.
- Employees are required to participate in all required training. Employees are expected to demonstrate that they can perform their job assignments safely and without risk to themselves or others.
- Employees are required and expected to follow and adhere to all safety-related rules and regulations while on the premises of this company and when performing duties or acting on behalf of this company. Employees are also expected to adhere to all job specific safety requirements while working on any Zwick project.
- Never operate tools or equipment that you have not been specifically authorized and instructed or trained to use.
- Never make unauthorized repairs or perform unauthorized service or maintenance on any machinery, equipment, or facilities. All equipment or machinery in need of repair must be reported to a supervisor immediately.
- Always use personnel protective equipment as required or instructed and trained.
- Adequate clothing must be worn at all times. Employees must be fully dressed in the work place at all times. Required clothing includes full length pants with no holes and shirts with at least four-inch sleeve.
- Keep your work area and the entire work place as clean as possible.
- Never run in the work place for any reason, even during emergency procedures or evacuation.
- Be constantly aware of your surroundings and the work in progress at all times.
- Plan your work, especially unfamiliar tasks, prior to performing it to ensure that any unsuspected safety hazards are considered.
- Employees must never put themselves or other employees at risk.
- Never take more than one step at a time when using stairs. Have one hand free for the handrail. Keep stairs free of loose objects. Never store anything in a stairwell.

- Shortcuts through various work areas are not allowed. Always use the prescribed passageways.
- Never remove material that is being used for accident prevention or safety barrier, such as machine guards, flagged areas or barricades.
- Read and become familiar with the elements of the safety program and related safe work practices.
- Do not distract an employee operating a machine or power tool.
- Work boots must be worn on site at all times.
- Designated lunch break areas are to be used.
- Stop sign and speed limit postings shall be followed at all times.
- Zwick Construction prohibits the use of personal electronic equipment such as, but not limited to iPods, music devices, etc. The use of such devices impairs one's ability to hear and identify a hazard in a timely manner and can also be a significant distraction.

ADMINISTRATIVE OPERATIONS AND OFFICE SAFETY

- Floors and walkways must be maintained in safe, passable condition and free of trip and fall hazards at all times. Never place or store equipment, materials, or other obstacles in areas that are utilized as walkways.
- Electrical and telephone cords, computer cables, and other obstacles must be kept out of passageways and walkways. Furniture and equipment must be arranged to minimize cords and cables being utilized in walkways.
- Electrical extension cords, pigtails, surge protectors, multiple socket strips must be rated for the intended use and overloading of power strips can cause fires and damage equipment.
- Liquid spills must be cleaned up immediately.
- Broken or otherwise hazardous chairs must be repaired or replaced.
- Tower type file cabinets must be loaded from the bottom up, to prevent stored material from making the cabinet top heavy, potentially falling on someone.
- Remove snow or ice from all designated pathways to and from the trailer and parking areas and jobsite.

AERIAL LIFTS

- General use and operation shall be per the manufacturer's instructions.
- Only authorized employees shall operate any aerial lift. This includes both scissor lifts and articulating lifts. If you are not authorized to work from aerial lifts, do not work, ride or climb in any aerial lift.
- All aerial lifts must be inspected for proper working operation before each use.
- Always stand firmly on the floor of the work platform, and do not sit or climb on the edge of the basket or guardrails as a work position.
- Do not use planks, ladders, or other devices for a work position above the guardrails that are providing fall protection.
- A full body harness and a three-foot lanyard shall be worn and attached to the basket while working from an extendible or articulating boom lift. A retractable lanyard system is also acceptable.
- Boom and platform load limits specified by the manufacturer must not be exceeded.

BACK INJURY PREVENTION

- Utilize all lifting devices provided whenever possible according to the nature of the lift and related job task.
- Never lift objects that are heavier than 50 lbs. without some type of assistance.
- Where lifting assist devices are not available, assistance from other employees should be requested to lift heavy or awkward objects.
- Always size the load and assess the object for weight, stability, and balance before lifting it.
- Plan the most direct and hazard free route of travel to the end destination of the object.
- If possible avoid lifting loads from below the knees or above the shoulders.
- If possible, push an object along the floor rather than lifting it. Avoid pulling objects.
- Never reach or twist to pick up an object.
- Do not obstruct your view when lifting or carrying objects.
- Always lift with a smooth motion rather than jerking a load.
- Try to break large, heavy loads into smaller, lighter ones.
- Never attempt a lift that you feel you are not capable of making safely.
- Never lean over an object in order to lift another object.
- Never reach or stretch to pick up an object.

In making a lift:

- Be sure you have a firm and stable footing as near the object as possible.
- Bend at your knees and not your waist, keeping your back straight.
- Get a good firm grip on the object.
- Lift with your legs and not your back.
- Keep the load close to your body.
- Do not twist at the waist but turn and point your feet in the direction you are moving or traveling with the load.
- Lower the load with the same movement used to lift it.

COMPRESSED AIR

- Only authorized employees may use or work with compressed air.
- Compressed air used for cleaning purposes should not exceed 30 p.s.i.
- Use any protective barriers or shields that are provided to protect others from flying debris created by using compressed air. Also take whatever steps necessary to ensure that others are protected when using compressed air.
- Eye and noise protection must be worn at all times when using compressed air for any reason.
- Additional personal protective equipment may be necessary or required, such as face shields, gloves, or other devices.
- Compressed air must never be used to clean or blow off a person's skin or clothing.
- Always roll up or put away all hoses and equipment used with compressed air so that it is out of the way of traffic and to ensure that it does not create trip or fall hazards.
- Compressed air hoses or tools may not be pointed at others at any time.
- Report defective nozzles, hoses, gauges, and regulators immediately to responsible supervision.
- Pneumatic tools and hoses will be used at recommended air pressure only.
- Pulleys and belts on air compressors must be completely guarded.
- Relief valves on all compressors should be inspected on a regular basis.
- Compressor air tanks should be drained of moisture on a regular basis.
- All safety devices on pneumatic tools must be in working order.
- All gauges must be in working order.
- All high pressure air hoses must be secured at all connections including at the compressor and at the tool by safety clips or tie wire and whip checks.

COMPRESSED GAS CYLINDERS AND LPG

- Only authorized employees may work with compressed gasses and compressed gas cylinders. If you are not authorized to work with compressed gasses, do not work with compressed gasses.
- Compressed gas cylinders and containers must be supported at all times to prevent them from falling. This can be accomplished by placing them in a cart designed to support such equipment for use, or by attaching the containers to a building support or other surface. This is usually most effectively accomplished using an adequate gauge or strength chain with a hook or fastener. Compressed gas cylinders and containers must be supported regardless of whether they are full or empty.
- Compressed gas cylinders and containers must have the protective cap in place when not attached to a gauge or other apparatus for use.
- Compressed gas cylinders and containers must always be stored in an upright position.
- Compressed gas cylinders and containers must be stored and located out of the paths of traffic, away from any areas where they might be struck by any type of vehicle, and away from any and all emergency exits.
- Compressed gases that are flammable must be kept away from those that are oxidizers (usually oxygen) when being stored. This is most easily accomplished by ensuring that flammables are stored at least 20 feet away from oxidizers.
- All compressed gas cylinders and containers must be handled and treated as if they were full.
- The amount of compressed gas cylinders that are kept on a job site should be kept to a minimum. All torch hoses must be protected by flash back arresters.

LPG USE (100 LBS OR MORE):

- Filling of fuel containers for trucks or motor vehicles from bulk storage containers shall be performed not less than 10 feet from the nearest masonry-walled building, or not less than 100 feet from the nearest building or other construction and, in any event, not less than 25 feet from any building opening.
- All containers, burners, regulators, hoses and connections shall be of an approved type and used in accordance with the manufacturer recommendations.

LPG STORAGE:

- Storage outside of buildings, for containers awaiting use, shall be located from the nearest building or group of buildings by a minimum of 25'
- Storage of any LPG containers not in use (full or empty) within buildings is prohibited.

- Containers shall be in a suitable ventilated enclosure or otherwise protected against tampering.
- Fire protection. Storage locations shall be provided with at least one approved portable fire extinguisher having a rating of not less than 20-B:C.
- When damage to LP-Gas systems from vehicular traffic is a possibility, precautions against such damage shall be taken.

CONCRETE & MASONRY

Only employees authorized to work with concrete or masonry products may work with these products. If you have not been specifically authorized to work with concrete or masonry products, do not work or perform any tasks related to these products.

CRANE SAFETY

- Only authorized employees may perform as signal persons or riggers. If you have not been authorized to perform as a rigger or signal person, do not perform any work related to rigging or signaling.
- Never stand under any suspended load.
- Never enter any area around any crane that you are not authorized to enter.
- Obey all crane signals and warnings.
- If possible, avoid all crane operations completely.

DEMOLITION SAFETY

Unless you are specifically authorized to perform any demolition operations, do not perform any demolition operations or tasks.

Stay out of and away from any area where demolition operations are being performed.

ELECTRICAL SAFETY

- Do not work in such proximity to any part of an electrical power circuit that may be accidentally contacted during the completion of the work assignment.
- All temporary 15 and 20 AMP electrical outlets will have approved Ground Fault Circuit Interrupter (GFCI) protection.
- Electrical extension cords used on the work site must be three-wire, industrial rated type and approved for hard service (i.e. - Type S, ST, SO, STO, SJ, SJT, SJO, SJTO).
- Household extension cords or flat cords are not permitted.
- Ground prongs must be in place on the cord and the equipment being energized and never removed for any reason. Never use any extension cords or tools with missing ground prongs. Report any tools or cords with ground prongs missing to a supervisor immediately.
- Electrical extension cords must be protected against accidental damage caused by traffic, sharp, corners, or projections and pinching in doors, windows or elsewhere.
- Electrical extension cords should not be fastened with staples, hung from nails, or suspended by wire.
- Electrical extension cords must be used in continuous length without splices, repairs, or taps. Cords that are damaged or that have insulation missing should be replaced immediately or tagged out of service and not used.
- Adapters that allow for bypass of the ground prong are not allowed.
- Electrical cords and cables must be kept out of paths and walkways and should never impede access to an emergency exit or means of egress from a building or structure or fire lane.
- All electrical cords must be inspected prior to each use to ensure they are properly insulated, ground prongs are in place, and they are in safe working condition. Employees should inspect electrical cords prior to each use to ensure that the cord is fully insulated and in safe working condition. Defective cords must be taken out of service immediately and tagged out of service or removed from the project.
- Keep electrical extension cords out of standing water
- Temporary lights shall be equipped with heavy-duty electric cords and connections and insulation maintained in safe condition. Temporary lights shall not be suspended by their electric cords unless specifically designed to do so.
- All temporary lights shall be equipped with cages (guards) to prevent accidental contact with the bulb. All sockets must be equipped with a working bulb.

ELECTRICAL SAFETY RELATED WORK PRACTICES

- Only licensed electricians are authorized to perform installation, service, or maintenance on electrical circuits. Zwick employees are not authorized to perform installation, service or maintenance of electrical circuits.

EMERGENCY RESPONSE

All Zwick employees are required to follow all emergency procedures established by the Project Superintendent.

- Make sure you know and understand all emergency procedures that have been established by your Project Superintendent on the specific project where you are assigned and working.
- Know the location of the muster point.
- Report immediately to the muster point following any emergency evacuation.

TRENCHING / EXCAVATION SAFETY

- Zwick employees are not authorized to open or work in any trench.
- Do not enter any trench.

FIRST AID

- Adequate first aid supplies must be provided and maintained for use in the work place.
- All Zwick-issued vehicles shall have a first aid kit and fire extinguisher.
- Emergency telephone numbers and a map to the nearest medical facility must be posted.
- All employees must report any injury or illness, regardless of the severity or magnitude, to an immediate supervisor within 24 hours.
- Only trained and authorized personnel may attempt to provide first aid or CPR.
- Never attempt to move a victim of an accident until their condition can be assessed by a qualified person, unless the victim is in immediate danger.
- Never expose yourself to blood or other bodily fluids or potentially infectious materials without proper training, protective measures, such as personal protective equipment and proper clothing.
- First aid kits and the supplies in them are intended to be used for self-treatment whenever possible. If further medical attention is needed, or necessary, it must be provided by a qualified medical provider.
- Items that become contaminated with blood or other potentially infectious bodily fluids must be properly contained and discarded in a manner that will not expose others. Treat every item, which contacted blood or body fluids as though it is contaminated. Isolate the articles from any further contact and notify your supervisor immediately.

FLAMMABLE LIQUIDS

- Only approved containers and portable tanks should be used for storage and handling of flammable and combustible liquids.
- No more than 25 gallons of flammable or combustible liquids should be stored in a room or in areas outside of an approved storage cabinet.
- Flammable liquids must be kept in closed containers at all times when not in use.
- Never attempt to pour flammable liquids from a large container such as a 55-gallon drum into a smaller container.
- Nozzles for transfer of flammable liquids from large containers must be approved, and be self-closing or automatic shut off type. Only approved manual stroke pumps where the liquid is drawn through the top of the container may be used.
- Containers of flammable liquids must be electrically grounded and interconnected (bonded) during transfer of liquids from one container to another, to reduce the likelihood of sparks being generated by a buildup of static electricity.
- Flammable liquids must not be stored or used in areas where they are exposed to sources of heat, spark, or flame.
- The use of flammable liquids must be restricted to well-ventilated areas.
- Store only the quantities of flammable liquids necessary for one work shift of operation in any work area.
- Rags and waste items or materials used in conjunction with flammable liquids must be placed in closed containers and discarded immediately after use.

FORKLIFTS

- Only employees who are authorized to operate forklifts may operate a forklift.
- Operators must inspect forklifts prior to the beginning of use on each work shift.
- Forklifts that have identified defects or unsafe conditions must be reported to a supervisor immediately and must not be operated until adequate repairs are made.
- The brakes of a highway truck or trailer must be set and the wheels chocked to prevent rolling before loading or off-loading with a forklift.
- Forklift engines must be turned off when operator is not in cab.
- The forks of a forklift must remain in a lowered position when driving without a load.
- The forks must always be lowered to the floor or ground level when forklifts are dismounted or parked.
- The operator must never allow additional passengers or riders on the vehicles or forks at any time.
- Loads being carried on ramps must remain on the uphill side of the vehicle when ascending or descending the incline.
- Operators must sound horns when traveling in areas where vision is obstructed, such as around corners and through bay doors.
- The load capacity of the equipment must never be exceeded.
- Never walk under or permit another person to walk under an elevated load.
- Never park forklifts or other vehicles near emergency exits.
- Forklifts must be equipped with an overhead protection rack and an audible warning device (horn) and back up alarm.
- Any other safety devices or equipment attached to a forklift such as lights must be in operating condition.
- An operator must be present while loads are elevated.
- Lifting of personnel platforms must comply with section covering Aerial Lifts.

HOUSEKEEPING AND WORKPLACE ORGANIZATION

- The work place must be maintained in a clean and sanitary condition free from accumulating trash and debris.
- Aisles, passageways, and walkways must be maintained free from obstruction.
- Sufficient illumination must be maintained in each work area.
- Floors must be maintained in a dry condition as much as possible, considering the nature of the work performed. Spilled liquids must be cleaned up immediately.
- Restrooms, wash up facilities, drinking fountains, and portable toilets must be maintained in a clean, sanitary condition at all times.
- All stored items must be stacked in a neat and orderly manner that is not conducive to the material shifting or falling.
- Hoses, cords, and other obstacles must be kept out of walkways when not in use.
- Equipment must be arranged to minimize the need to run cords and hoses across paths and walkways.
- Hazardous materials must be identified and stored in a manner that minimizes the exposure to any associated or potential hazards.

JOB SITE OFFICE SAFETY

- Stairs, floors and walkways must be maintained in safe, passable condition and free of trip and fall hazards at all times.
- Remove snow or ice from walkways and designated areas for walking to and from trail to other areas on the project.
- Electrical and telephone cords, computer cables, and other obstacles must be kept out of passageways and walkways. Furniture and equipment must be arranged to minimize cords and cables being utilized in walkways.
- Electrical extension cords, pigtailed, surge protectors, multiple socket strips must be rated for the intended use and overloading of power strips can cause fires and damage equipment.
- Liquid spills must be cleaned up immediately by the first person identifying the wet condition.
- Broken or otherwise hazardous chairs must be repaired or replaced.
- File cabinets must be loaded from the bottom up, to prevent stored material from making the cabinet top heavy, potentially falling over.
- Building entrances should be provided with a storm mat or other means to prevent floors from becoming slippery, when rain or other weather conditions would contribute to a hazard.
- Take special precautions when weather conditions create hazardous walking.

LADDERS AND STAIRWAYS

LADDERS

- All ladders must be inspected by a competent person for visible defects on a periodic basis and after any occurrence that could affect their safe use to ensure safe working condition.
- All defective or damaged ladders must be immediately removed from service and no longer used until repaired or replaced.
- Ladders must be used only for the approved and intended purpose for which they were designed.
- No self-supporting or straight ladders must be erected on a sound and solid support, level with the base of the ladder, a distance ratio of 1:4 from the support structure.
- Metal ladders or ladders with metal components are not allowed
- Ladders used to reach elevated working surfaces or roofs will extend not less than three feet (36 inches) above the level to be accessed.
- Ladders should never be painted or altered in a manner that could hide or prevent the recognition of defects.
- Ladders must be tied, blocked or otherwise supported to prevent them from being displaced.
- Only one person is allowed on a ladder at a time.
- The top two steps of a stepladder must not be used as steps.
- Areas at the foot and top of ladders should be kept clear of debris and stored materials.
- Stepladders must be equipped with a metal spreader or locking device to securely hold the front and back sections in place and should be used only when fully opened.
- Stepladders should not be used as straight ladders.
- Ladders should not be used in passageways, around doorways or in other areas where accidental displacement could occur while the ladder is in use.
- Ladders must be maintained free of oil, grease and other slipping hazards.
- Ladders should not be moved, shifted or extended while occupied. The walking of ladders is not allowed.
- Ladders must not be loaded beyond the maximum intended load for which they were built, or beyond their manufacturer's rated capacity.

- When climbing or descending a ladder, the user should face the ladder and always use three points of contact. No object or load should be carried.

JOB-MADE LADDERS

Job-made ladders are prohibited on all Zwick Construction projects.

STAIRWAYS

- All stairways with four or more risers or those rising more than 30 inches in height, whichever is less, must be guarded by a standard handrail and stair rail system on all open sides. A standard stair railing consists of a top rail approximately 42 inches above the stairs, and a middle rail at approximately 21 inches. The railing system must be capable of supporting at least 200 pounds of pressure applied in any direction. Closed-sided stairways must have a handrail on at least one side of the stairway.
- Handrail systems should be surfaced so as to prevent injury to employees from punctures or lacerations, and should provide adequate handhold for employees to grasp. Permanent stairways must not be used until completely installed, including the filling in of the pan type stairways and the installation of all guardrails and handrails.

LASER EQUIPMENT

- Only authorized and qualified personnel are allowed to install, adjust, and operate laser equipment. If you have not been authorized to operate laser equipment, do not operate laser equipment. If you are not authorized to operate laser equipment, avoid areas where laser equipment is being operated.
- Hazard warning signs must be posted and controlled access zones utilized to minimize potential exposure.
- When working in areas in which a potential exposure to direct or reflected laser light, greater than 0.005 watts exists, eye protection should be used.
- Beam shutters or caps must be utilized when laser transmission is not actually required. When the laser is left unattended for a substantial period of time, such as during lunch hours, overnight, or at change of shifts, the laser should be turned off.
- Only mechanical or electronic means should be used as a detector for guiding the internal alignment of the laser.
- The laser beam should never be directed at any personnel.
- The operation of the laser systems shall be prohibited or suspended when it is raining, snowing, or when there is dust or fog in the air.

MACHINE AND EQUIPMENT GUARDING

- Only authorized employees may operate any machine, tool or equipment. If you are not authorized to operate a specific type of machine, tool or equipment, do not operate the tool, machine or equipment.
- Machine guards must be installed to ensure that accidental bodily contact with moving parts of the machinery is avoided. This is especially critical at the point of operation (point where work is performed on material).
- All belts, pulleys or chain and sprocket assemblies must be guarded to prevent accidental contact.
- Tripping devices or controls must be arranged and guarded to prevent accidental operation or cycling of machinery or equipment.
- Fixed or stationary machinery or equipment must be fastened or attached to the floor, working surface, or other support structure to prevent accidental movement.
- Machine guards must be provided and utilized at all times.
- Machine guards must remain in place at all times during operation. Guards may be removed only if necessary for service or maintenance procedures, only after machinery or equipment has been effectively de-energized and locked or tagged to prevent restarting or re-energizing.
- Only qualified and authorized personnel may perform service or maintenance on any machinery or equipment.
- Never place hands or other body parts in or near moving parts or hazardous areas of machinery or equipment for any reason, unless the equipment has been de-energized and the power sources securely isolated.
- Never make an unauthorized attempt to operate machinery or equipment. Operators must never allow unauthorized employees to operate machinery or equipment.

MECHANIZED EQUIPMENT

- All vehicles must have a service brake system, an emergency brake system, and a parking brake system in operable condition.
- All vehicles must have a horn in operable condition.
- All cracked or broken glass must be replaced.
- All vehicles in use must be checked at the beginning of each shift to assure safe operating condition and freedom from apparent damage that could cause failure during use.
- Seat belts along with roll over protects (ROPS) are required for all equipment.
- All earth-moving equipment must have a service brake system capable of stopping and holding the equipment when fully loaded.
- All bi-directional equipment must be equipped with a horn and operated as needed when the machine is moving.
- All equipment must have a working reverse signal alarm.
- All blades, buckets, dump-bodies and similar equipment must be either fully lowered or blocked when not in use and before any employee is allowed to work under them.
- The use of personal music players is prohibited when operating any mechanized equipment.
- No person will be allowed to operate mechanized equipment with a detectable presence of alcohol or drugs in their system.
- Approach all areas of cross traffic with caution. Always look first to the left, then to the right and back to the left before proceeding, but remain prepared to yield the right-of-way.
- Avoid the backing of equipment whenever possible.
- Equipment must be inspected daily by the driver to assure that the vehicle is in good mechanical condition. The driver of the equipment is responsible for the condition of the unit.
- Care should be exercised so that grass fires are not ignited due to improper parking or stopping in grassy areas.
- Seat belts must be used at all times while operating equipment.
- All operators must be qualified and authorized to operate equipment.

UTILITY VEHICLES

This policy applies to all utility vehicles used at project construction sites. (Golf Carts, ATV's, etc. ...)

The safe operation of utility vehicles should be in accordance with the manufacturer's recommendations and any applicable local, State or Federal Regulations.

Preventive Maintenance is the best way to provide a safe utility vehicle. For the safe use and operation of utility vehicles follow the guidelines listed below:

- Pedestrians shall be afforded the right of way at all times.
- Supervisors shall ensure that employees authorized to operate utility vehicles are advised of Zwick Policy.
- Utility vehicles shall only be operated within the confines of the project.
- Utility vehicles must be equipped with a functional horn or equivalent.
- Operators of utility vehicle that are not equipped with turn indicators must use appropriate signals when turning.
- Incidents/Accidents involving utility vehicles must be immediately reported to the Zwick Safety Department.
- Visually check area behind the vehicle before backing up.
- Only authorized Zwick Personnel are allowed to operate a utility vehicle.
- Do not operate the utility vehicle on any public streets, highways or roads.
- Do not exceed posted speeds or speeds that are considered safe for the vehicle or terrain you are traveling in.
- Always wear approved protective helmet and other protective gear as required.
- One rider per utility vehicle unless it is designed for two riders. DO NOT DOUBLE RIDE
- Do not operate utility vehicle while on medication or intoxicated.
- Always read the instruction manual prior to use and follow the manufacturer's guidance for use, maintenance and pre-use checks.
- Use lights, reflectors and flags when operating your utility vehicle during night operations or time of low visibility.
- Key must remain with operator when not in the utility vehicle
- Wear the recommended clothing for conditions and use of the utility vehicle

- Wear seat belt.
- Do not tamper with or destroy any safety label or devices on the utility vehicle.
- Always follow the recommendations and requirements of the manufacturer while operating the utility vehicle.

Daily visual inspection must be completed before operating a utility vehicle:

- Are tires and wheels in good condition?
- Are controls operational?
- Do brakes work?
- Is riding gear (including helmet) available and worn?

NOTE: Collisions with automobiles on public roads are the most common cause of fatal accidents involving utility vehicles. It is illegal to operate a utility vehicle on public roads.

RESPIRATORY PROTECTION

Only authorized employees are permitted to use or wear any respiratory protection.

If you wish to wear and use respiratory protection on a voluntary basis, you must still be authorized to wear and use a respirator. Contact the Safety Director.

Typically, Zwick employees will not be required or work in areas where respiratory protection is necessary. If it does become necessary for one or more Zwick employees to wear and use a respirator, the Safety Director will authorize those employees to wear and use respirators.

- Only approved respirators are to be used in areas or around material that warrant their use.
- Prior to use, employees must be fitted and trained in the use of respirators.
- Respirators must never be altered or used in a manner for which they are not intended.
- Respirators that do not have a self-contained air supply (air tank) must never be used in oxygen deficient or extremely dangerous atmospheres or conditions.
- Respirators must be cleaned after each use prior to storage.
- Respirators must always be stored in a clean location at all times when not in use.
- Respirators must be checked and inspected prior to each use. Damage or malfunctions must be reported to a supervisor immediately.
- Respirators should be thoroughly cleaned after each use.
- Application of some paints and stains may require the use of respiratory protection.

SCAFFOLDING SAFETY

Only authorized employees are allowed to work from any scaffolding including scissor lifts or articulating lifts or any manually propelled scaffold. If you have not been authorized to work from scaffolding, including scissor lifts, articulating lifts or manually propelled scaffolding, do not work from scaffolding.

- All scaffolding will be inspected by a competent person before each use. Never use any equipment that is damaged or defective in any way.
- Erection, dismantling or alteration of a scaffold will be done only under the direct supervision of a competent person.
- Scaffolding equipment must be used only for purposes for which it is intended.
- Erected scaffolds must be continually inspected by the competent person to ensure they are maintained in a safe condition.
- Scaffolds must be erected in accordance with design and/or manufacturers' recommendations.
- A survey must be made for hazardous conditions in the area(s) where the scaffolding is to be erected.
- Scaffolds and their components must be constructed with the capability of supporting, without failure, at least four times the maximum intended load.
- Scaffolding must be placed on solid footing. No barrels, blocks, or boxes will be allowed as supports for scaffolds.
- Guardrails, mid-rails and toe boards must be used on all open sides and ends of scaffold platforms that are more than 10 feet above the ground or floor.
- Scaffolds that are 4 to 10 feet high and are less than 45 inches in either direction horizontally must have guardrails on all open sides and ends of the platform.
- Scaffolds must be tied to the structure per OSHA requirements.
- Scaffold platforms must not be cluttered with tools, materials or other loose objects.
- Working on outdoor scaffolds during storms, high winds, or icy conditions is prohibited.
- The height of mobile scaffolds must not exceed four times the narrowest base dimension, and the casters must be equipped with positive locking devices.
- No one is permitted to ride a mobile scaffold while it is being moved.
- The work platform of a mobile scaffold should be planked as completely as possible.
- An access ladder or equivalent will be provided for safe access to and from the work

level of the scaffold.

- Do not work on scaffolds if your physical condition is such that you feel dizzy or unsteady in any way.
- The scaffold base must be anchored on an adequate mudsill or pad to prevent slipping or sinking.
- Use adjusting screws or other approved methods instead of blocking, when adjusting or making the scaffold even.
- Bracing, leveling, and plumbing of scaffolds:
- Plumb and level all scaffolds as the erection proceeds.
- Do not force frames or braces to fit; level the scaffold until proper fit can easily be made.
- Each frame or panel shall be braced by horizontal bracing, cross bracing, diagonal bracing or any combination thereof for securing vertical members together.
- All brace connections shall be made secure.
- Fasten all couplers and/or connections securely before assembly of the next level.
- Do not erect scaffolds near electrical power lines unless proper precautions are taken.
- Guardrails shall have a vertical height 42 inches, including a mid-rail approximately 21 inches, midway between the top rail and the working surface.
- Hard hats shall be worn by employees working on any scaffolding.
- Scaffold Planking:
- Check each plank prior to use to be sure plank is not warped, damaged, or otherwise unsafe.
- Planking shall have no more than 12 inches of overlap and extend 6 inches beyond the center of support, or be restrained at both ends to prevent sliding off the supports.
- Working platforms shall cover the scaffold bearer as completely as possible.
- Only scaffold grade wood planking, or fabricated planking and decking meeting scaffold use requirements, shall be used.
- Do not jump onto planks or platforms.
- The work level platform of scaffolds shall be decked of approved wood, aluminum or plywood planking, for the full width of the scaffold, except for necessary openings.
- Do not overload or clutter the platform working area.

SCAFFOLD DISMANTLING PROCEDURES

- Check to make sure that the scaffolding has not been structurally altered in a way, which would make it unsafe and, if it has, reconstruct where necessary before commencing with dismantling procedures. This includes all scaffold ties.
- Consideration must be given of the effect the removal of a component will have on the rest of the scaffold prior to the component's removal.
- Do not accumulate excess components or equipment on the level being dismantled.
- Do not remove ties until the scaffold above has been removed or dismantled.
- Lower dismantled components in an orderly manner. Do not throw them off of the scaffold.
- Dismantled equipment should be stockpiled in an orderly manner.
- Follow any erection and/or dismantling procedures and use manuals supplied by the scaffolding manufacturer.

PUMP JACK SCAFFOLDS

- Pump jack scaffolds shall:
- Not carry a working load exceeding 500 pounds.
- Be capable of supporting without failure at least four times the maximum intended load.
- The manufactured components shall not be loaded in excess of the manufacturer's recommended limits.
- Pump jack brackets, brace, and accessories shall be fabricated from metal plates and angles. Each pump jack bracket shall have two positive gripping mechanisms to prevent any failure or slippage.
- The platform bracket must be fully decked and the planking secured.
- When wood scaffold planks are used as platforms, poles used for pump jacks must not be spaced more than 10 feet center to center.
- Poles must be secured to the work wall by rigid triangular bracing, or equivalent, at the bottom, top, and other points as necessary, to provide a maximum vertical spacing of not more than 10 feet between braces.
- All poles must bear on mudsills or other adequate firm foundations.
- Pole lumber must be two 2 X 4's, of Douglas Fir, or equivalent, straight-grained, clear, free of cross-grain, shakes, large loose or dead knots, and other defects which might impair strength.

- When poles are constructed of two continuous lengths, they must be two by fours, spiked together with the seam parallel to the bracket, and with 10d common nails, no more than 12 inches center to center, staggered uniformly from opposite outside edges.
- If two by fours are spliced to make up the pole, the splices must be so constructed as to develop the full strength of the member.
- Not more than two employees are permitted at one time upon a pump jack scaffold between any two supports.
- Pump jacks scaffolds shall be provided with standard guardrails and end rails. Guardrails are not required when safety belts with lifelines are provided for employees

TOOLS

- All Zwick employees must be authorized to operate any tool including all hand and power tools. If you have not been authorized to operate a tool, do not operate the tool.

All manufacturer recommendations and instructions must be followed for the particular tool. (Consult the user's manual)

- Only authorized and qualified employees will be allowed to use or operate any power tools.
- All tools must be maintained in safe operating condition including employee owned tools. Tools and accessories will be kept clean and sharp for best performance.
- Never leave or operate tools where heavy traffic areas are designated. If necessary establish barriers before operating tools in heavy traffic areas.
- Maintenance or adjustment of tools, while the tool or any part of the tool is in motion or operation is prohibited.
- Tools and equipment must be routinely inspected to ensure that they are maintained in safe working condition.
- Tools that are found to be defective must be removed from service until repaired or replaced. Tools removed from service should be tagged or otherwise labeled to be kept out of service.
- Eye protection is required when using hand or power tools when flying particles are hazard to eyes.
- Tools are to be used only for the purpose for which they are intended.
- Use the proper tool, considering the size and type appropriate for the job.
- Do not use worn or damaged tools. Do not use tools with cracked, broken or loose heads.
- Do not operate tools beyond their rated limits, or try to increase their capacity with by-passes, cheaters or other modifications.
- Do not use hoses or electric cords for hoisting or lowering tools or other materials.
- Never pull the cord to disconnect it from the receptacle, but pull the receptacle.
- Be sure that safety guards are in working order and in place before operating any power tool.
- All electric tools must be grounded or protected by a manufactured system of double insulation.

- Do not use electrical tools with frayed or damaged supply cords. Keep all cords away from heat, oil and sharp objects and water.
- Keep moving parts of power tools pointed away from your body and others. Do not hold a finger on the switch button while carrying a plugged in tool.
- Do not operate electrical tools while standing on damp or wet surfaces.
- Take special precautions when using power tools on a scaffold, ladder or other locations that restrict movements.
- Be sure that a power tool is off and all motion has stopped before setting the tool down.
- Disconnect the tool from the power source before changing drills, blades or bits or attempting repair or adjustment. Never leave a running tool unattended.
- Do not operate an explosive powder-actuated tool unless you have been trained and are qualified to do so.
- Never point a powder-actuated tool at anybody.
- Before using a powder-actuated tool, inspect it to make sure it is clean, that all moving parts operate freely, and that the barrel is free from obstruction.
- Do not load a powder-actuated tool unless it will be used immediately. Never leave a loaded tool unattended.
- Always follow manufacturer recommendations when disposing of misfired loads.
- Always follow manufacturer recommendations when using power actuated tools.

PNEUMATIC NAIL (HAMMER) GUNS

- Only authorized employees are allowed to operate any pneumatic nail gun.
- The primary danger encountered in the use of pneumatic nail gun is getting hit by one of the fasteners, discharged by the tool.
- All employees operating pneumatic nail guns shall be trained in the safe operation and maintenance of the unit.
- Never leave powder cartridges lying around or discarded on the floor. Cleanup of cartridges used or unused daily and after use.
- DO NOT put your finger on the trigger, until you are ready to fire the unit.
- DO NOT disable or alter any safety mechanism on the unit.
- DO NOT attempt to repair any broken or malfunctioning unit. Authorized personnel must make all repairs.

- DO NOT point a nail gun toward anyone. Users should never “dead-end” it against themselves or anyone else.
- DO NOT allow anyone to stand or work behind / under material being nailed. Be cautious of unintentional down range targets.
- All pneumatically-driven nail guns, staplers, and other similar equipment provided with automatic fastener feed, which operate at more than 100 p.s.i. pressure at the tool shall have a safety device on the muzzle to prevent the tool from ejecting fasteners unless the muzzle is in contact with the work surface.
- Always disconnect the unit from the air source before attempting to dislodge a jam or service the unit.
- Eye protection is required and face protection is recommended for employees working with pneumatic tools.
- Pneumatic nail guns shall be secured to the hose or whip by some positive means to prevent the tool from becoming accidentally disconnected.
- The manufacturer’s safe operating pressure for hoses, pipes, valves, filters and other fittings shall not be exceeded,
- The use of hoses for hoisting or lowering tools shall not be permitted.
- All hoses exceeding 1/2-inch inside diameter shall have a safety device at the source of supply or branch line to reduce pressure in case of hose failure.

VEHICLE LOADING AND UNLOADING SAFETY

- Vehicles being loaded or unloaded must be positioned as close as possible to the work area.
- Vehicles must be as level as possible.
- Loading and unloading with a vehicle parked on a roadway must be avoided if at all possible.
- If the vehicle must be located on a roadway, make sure the flashers are turned on. Set out flares or cones and barricades for added safety and protection. Do not walk or work on the traffic side of the vehicle. Exit and enter the cab using the door on the side away from oncoming traffic.
- The vehicle, trailer or flatbed must be checked for obstacles or hazards, such as bad flooring and protrusion on the walls before the loading or unloading operations are started.
- The trailer brakes must be set and wheels secured in place before loading or unloading operations are started.
- Personal protective equipment such as gloves, hard hats and safety shoes may be required as the safety exposures dictates.
- Avoid pinch points, such as those that occur when setting the load down.
- All material must be secured sufficiently to prevent shifting during travel.
- Pallets or containers must be used for smaller items.
- Do not let familiarity with truck loading and unloading lead to carelessness and injuries or accidents.
- Do not attempt to lift or unload items by yourself that are too big, too heavy or too odd for one person to unload - GET HELP!
- Extreme caution should be used when an off loading device such as a forklift is used to unload material. Make sure load is balanced and loaded securely on the lift and all by standards are out of harm's-way.

WELDING AND TORCH CUTTING SAFETY

- Only authorized employees will be allowed to perform any torch welding and cutting. If you have not been authorized to operate torch welding and cutting equipment, do not operate this equipment.
- Never attempt to operate welding machines or cutting torches or perform welding or cutting operations unless proper training and authorization has been given.
- Always ensure that all employees and other employees that might be in the area are protected from harm from full-light rays, sparks, hot material, and any other hazards associated with the welding or cutting process.
- Proper eye protection is required for any type of welding and cutting operation. The magnitude of protection will vary depending on the type of operation, but some type of eye protection is required at all times when performing or exposed to welding and cutting operations.
- Hand protection in the form of flame resistant cotton or leather gloves is required for all welding and cutting operations.
- Welding and cutting operations must be isolated from flammable and combustible materials and other fire hazards.
- A fire extinguisher must be temporarily located in close proximity to any welding or cutting operation.
- Terminal leads on welding machines must be insulated in appropriate working conditions or protected from accidental contact.
- Back flow restriction and flashback prevention devices should be installed on all oxygen and fuel gas cutting torch systems.
- Welding and cutting hoses, leads, gauges, and equipment must be routinely inspected to ensure safe operating condition. Equipment displaying defects or hazards must be removed from service until repaired or replaced. All torch hoses must be protected by flashback arresters.
- Cutting holes in floors or decks must be barricaded or protected immediately.
- Ensure that the cart, bottles, wrenches and fire suppression equipment is in close proximity (preferably on the same working level) to allow for quick access in the event of an emergency.
- Compressed gas cylinders shall be secured in an upright position at all times
- When a special wrench is required, it shall be left in position on the stem of the valve while the cylinder is in use so that the fuel gas flow can be shut off quickly in case of an emergency.

- Oxygen cylinders in storage shall be separated from fuel-gas cylinders or combustible materials (especially oil or grease), a minimum distance of 20 feet or by a non-combustible barrier at least 5 feet high having a fire-resistance rating of at least one-half hour.
- Storage of cylinders inside of buildings shall be in a well-protected, well-ventilated, dry location, at least 20 feet from highly combustible materials such as oil or excelsior.
- Cylinders should be stored in assigned places away from elevators, stairs, and gangways or in vehicular traffic patterns.

STEEL ERECTION

- Only authorized employees may engage in any steel erection activities. If you are not authorized to perform any steel erection activities or related operations, do not engage in these operations.
- Generally, Zwick employees are not authorized to perform any steel erection tasks or related tasks.
- Steel erection will be the responsibility of the specific steel erection subcontractor.
- If possible, stay out of areas where these operations are taking place.
- If you must enter areas where these operations are taking place, do not get in the way of the operations or linger under steel members that are hoisted, hanging or placed overhead.
- Proper communication prior to the beginning of the steel erection operation is essential to maintain employee safety. Many accidents involving steel erection could have been averted had adequate pre-erection communication and planning occurred.

The following requirements for site preparation, including site layout, pre-planning of overhead hoisting operations, and (in some cases) site-specific erection plans, are required by OSHA 29CFR1926, Subpart R.

APPROVAL AND COMMENCEMENT

The controlling contractor must provide written notification to the steel erector ensuring that:

- Concrete in footings, piers, and walls has been cured to a level that will provide adequate strength to support any forces imposed during steel erection
- Anchor bolt repairs, replacements and modifications were done with the approval of the project Structural Engineer of Record

SITE LAYOUT

- In order for the steel erector to perform necessary operations in a safe manner, the controlling contractor must provide and maintain access roads into and through the site that are adequate for safe delivery and movement of:
- Derricks, cranes, trucks, other necessary equipment, and the material to be erected
- Means and methods for pedestrian and vehicular control.
- Adequate space for the safe storage of materials and the safe operation of the erector's equipment, which is firmly, properly graded, drained, readily accessible to the work

PRE-PLANNING

All hoisting operations in steel erection must be pre-planned to ensure that employees are not working directly below suspended loads, except for:

- Employees engaged in the initial connection of the steel or
- Employees necessary for the hooking and unhooking of the load

WHERE EMPLOYEES MUST WORK UNDER THE LOAD, ENSURE THAT THE MATERIALS BEING HOISTED ARE:

- Rigged to prevent unintentional displacement
- Prevented from slipping by the use of hooks with self-closing safety latches or their equivalent
- Rigged by a qualified rigger

SITE-SPECIFIC ERECTION PLAN

Because of site-specific, unique requirements, subcontractors may develop alternate means of providing the employee protection required. If a site-specific erection plan is used, it must be developed by a qualified person, and be available at the work site.

COMPONENTS OF A SITE-SPECIFIC ERECTION PLAN

A site-specific erection plan is developed during one or more pre-construction conferences and site inspections involving the erection contractor, the controlling contractor, and others such as the project engineer and the fabricator. In this process, the following elements are considered: The sequence of erection activity, developed in coordination with the controlling contractor, including the following:

- Material deliveries
- Material staging and storage
- Coordination with other trades and construction activities.
- A description of the crane and derrick selection and placement procedures, including the following:
 - Site preparation;
 - Path for overhead loads
- Critical lifts, including rigging supplies and equipment.
- A description of steel erection activities and procedures, including the following:

- Stability considerations requiring temporary bracing and guying
- Erection bridging terminus point
- Notifications regarding repair, replacement and modifications of anchor rods (anchor bolts)
- Columns and beams (including joists and purlins)
- Connections
- Decking, ornamental and miscellaneous iron.
- A description of the fall protection procedures that will be used.
- A description of the falling object protection procedures that will be used.
- A description of the special procedures required for hazardous non-routine tasks.
- A certification for each employee who has received training for performing steel erection operations.
- A list of the qualified and competent employees.
- A description of the procedures that will be utilized in the event of rescue or emergency response.

In addition, the plan should include identification of the site and project, and be signed and dated by the qualified person(s) responsible for its preparation and modification.

The erection contractor shall maintain compliance with the applicable provisions of 29 CFR 1926, Subpart R, with respect to the erection process, under the direction of a competent person.

ZWICK CONSTRUCTION

SUPERINTENDENT & PROJECT MANAGER JOB SITE SAFETY AND RISK CONTROL RESPONSIBILITIES

1. Monitor the safety compliance of all Zwick employees, Subcontractors and all other contractors on the project and enforce the Zwick Construction Safety Program and the Zwick Construction Site Specific Safety Program on your job site. Make sure all employees and contractors on your job site are in compliance with all Zwick site specific safety requirements. Use all available resources to assist you in monitoring the safety compliance of all employees and contractors on your job site. The Superintendent is responsible and accountable for job site safety.
 - a. Conduct subcontractor orientations using the Zwick safety orientation program. The supervisor for each subcontractor must sign-off that they have reviewed, understand and agree to abide by the requirements presented in the site specific safety orientation.
 - b. If you observe a Zwick employee or a subcontractor not in compliance, you must correct the unsafe behavior immediately. Do not walk past an unsafe act or an unsafe condition (unsafe behavior), without correcting it immediately.
 - c. If you continue to observe a particular Zwick employee or a subcontractor engaging in unsafe behavior or not in compliance with OSHA or Zwick site specific safety requirements, you should address the unsafe behavior formally with the offending individual.
 - i. In the case of a Zwick employee, address the situation with the employee directly. Document all discussions involving the employee. If necessary, contact the Safety Director for assistance.
 - ii. In the case of an employee of a subcontractor, address the situation with the offending individual's supervisor. Document all discussions concerning Subcontractor non-compliance.
 - iii. If there are contractors on the site who are contracted directly to the owner and are not in compliance with OSHA regulations or the Zwick Site Specific Safety Program, you must notify the owner of the situation. Make sure that you notify the owner of the situation in writing as a courtesy to the owner.
2. Manage the Zwick Construction Hazard Communications Program on your job site.
 - a. Maintain a list of the hazardous chemicals being used or suspected to be present on your job site.
 - b. Be able to access an SDS for any chemical being used or suspected to be present on your job site.
 - c. All subcontractors are required to provide Zwick with an SDS for any chemical or substance they bring onto the project site.

3. Manage the Sanitation program on your job site.
 - a. Provide portable toilet facilities.
 - i. Require all contractors to use these toilet facilities.
 - ii. Any worker observed relieving themselves on site out in the open must be removed from the project immediately.
4. Manage the emergency response program.
 - a. Provide (post) all emergency numbers.
5. Manage job site security.
 - a. Make sure that the trailer doors are equipped with a deadbolt lock. If other security is necessary to protect valuable tools & equipment left inside the trailer, make sure that it is installed.
 - b. Make sure all windows are protected by steel bars.
 - c. Make sure your job site trailer is locked anytime you are not in the trailer.
 - d. If tools are left in the trailer, lock them in a metal tool box.
 - e. Make sure the trailer is adequately lighted at night and is visible from the main road(s).
 - f. If the job site is fenced, make sure that all access gates are locked during non-working hours. Provide keys to a limited number of persons who you trust.
 - i. Make sure that the fence is maintained in good condition.
 - ii. Make sure that warnings are posted on the fence and at the gate.
 - iii. Make sure all security fences are secured against anticipated wind velocities.
 - g. If possible, do not leave valuable tools & equipment outside in the open during non-working hours. If you can bring them into the job site trailer or tool trailer, then do so.
 - h. Do not store gasoline powered equipment inside the job site trailer.
 - i. Make sure all cutting equipment is locked up at night so that this equipment is not available for use by perpetrators to cut into trailers and tool boxes.
6. Report all theft and vandalism to the police or sheriff immediately upon discovery and to the Zwick Safety Director.
 - a. When you discover a theft or vandalism, take a complete inventory so that you can identify all stolen or damaged items.
 - b. Use the Zwick form to list all stolen or damaged items.

Safety Meetings

1. Conduct a weekly safety meeting for all Zwick employees assigned to your project. Document all site safety meetings with Zwick employees using a sign-in sheet showing the date of the meeting, all participants (sign-in) and the safety topics discussed during the meeting.
2. Make sure subcontractors hold weekly safety meetings. Superintendents must require Subcontractors to provide them with documentation of their weekly safety meetings. Documentation includes date of meeting, subject's discussed and participant list (sign in).

Periodic Safety Inspections

1. Conduct weekly job site safety inspections using the Superintendent Job Site Weekly Safety Inspection form. The Superintendent should maintain a file on site of the completed inspection forms.
 - a. Review these in your Subcontractor meetings so that subcontractors are aware of your findings and observations.

Fire Protection Program

1. Manage the fire protection program on site.
 - a. Enforce the Zwick Construction emergency response procedure for fires. Conspicuously post emergency response phone numbers for fire emergencies in the project construction trailer.
 - b. Energize the permanent fire hydrants on site as soon as possible.
 - c. Make sure all fire hydrants are visible and accessible at all times.
 - d. If necessary during winter months, identify fire hydrants with flagging.
 - e. Cover fire hydrants that are not energized with black plastic, until they are energized and then remove the plastic.
 - f. Make sure there are a sufficient number of ABC type fire extinguishers on site and in the work areas at all times.
 - g. Make sure all Zwick fire extinguishers on site are fully charged and tagged with the most recent annual inspection date and the annual inspection is current to the past 12 months.
 - h. Make sure that subcontractors supply portable fire extinguishers suitable for their work. Make sure that the fire extinguishers subcontractors bring on site are fully charged and tagged with the most current annual inspection date and that the annual inspection is current.

- i. Smoking Policy. Establish the smoking policy on your jobsite. Identify all non-smoking areas with appropriate signage. Smoking is not allowed inside any structure at any time.

Note: Smoking is not allowed on all LDS Temple and Chapel projects and anytime the owner designates the project a non-smoking project.

2. Maintain the first-aid kit and bloodborne pathogen kit.
3. Perform basic first-aid for Zwick employees only.
4. Transport injured Zwick employees to the designated medical provider or call for emergency response when required.

Accident / Injury / Incident Investigations

1. Investigate all job site incidents and injuries. Any incident or injury that occurs on the Zwick job site must be investigated by the Zwick Superintendent. This includes all incidents/injuries involving employees of subcontractors, all incidents/injuries involving private persons or visitors to the site, property damage to Zwick or owner property, damage to Zwick equipment, theft or vandalism of Zwick or owner property or equipment, and break in to Zwick or owner trailers or site buildings and all other incidents that involve injury or damage, theft, break-in, or vandalism. Use the appropriate Zwick incident forms.
 - a. Report all jobsite incidents and injuries to Chris Rongstad by phone immediately.
 - b. E-mail all completed incident reports to the Safety Director upon completion and as soon as possible.
 - c. Maintain a job site file of all incidents / injuries that occur on your job site.
2. Investigate & Report any Motor Vehicle Accident you, as an Employee, are involved in while operating a Zwick owned vehicle or any vehicle including your own personal vehicle being operated on company business. Report the accident as soon as possible by phone to the Safety Director. Use the Motor Vehicle Accident form for your written report. Email the completed form to the Safety Director as soon as possible.
 - a. If you allow another approved driver to drive your vehicle and that person is involved in a motor vehicle accident, follow these same procedures in reporting the incident.

OSHA Inspections

1. Participate in all OSHA inspections.
 - a. Immediately notify the Safety Director of any OSHA Compliance inspection.
 - b. Cooperate with inspectors (compliance officers). Participate in the inspection.
 - c. All foremen and / or supervisors of subcontractors must participate in the OSHA

compliance inspection. If not on site on the day of the inspection, contact the sub-contractor via phone and request that they attend the inspection.

- d. Remember, you have an hour to notify all appropriate people prior to OSHA conducting their inspection.
- e. Photograph everything the OSHA inspector photographs.
- f. Take notes during the inspection. Write down all comments made by the inspector concerning all OSHA compliance or non-compliance issues the inspector identifies.
- g. Obtain a copy of the inspection report the inspector will generate after their inspection of your job site.
- h. E-mail all inspection reports to the Safety Director as soon as possible.
- i. Send photographs that you took during the inspection to the Safety Director as soon as possible. E-Mail digital photographs.

OSHA Citations

1. Post the citation in the job site trailer immediately and until notified by the Safety Director to remove.
2. If requested, participate in the informal conference with the Safety Director.
3. If requested and required, participate in the formal contest with OSHA.

Visitors

1. Monitor and control visitors to your job site.
 - a. Make sure that visitor warning signs are posted at all entrance gates.
 - b. Make sure that all visitors check in at the main office to get permission to enter the work areas.
 - c. Make sure that all visitors are escorted on the site.
 - d. Make sure that all visitors wear the appropriate clothing and PPE while on the site.

Vehicle Traffic Flow / Movement

1. Manage traffic flow on your job site.
 - a. Make sure appropriate traffic warning signs are posted.
 - b. Make sure speed limit signs are posted.
 - c. Make sure all job site roads are maintained.

- d. Control dust created by vehicle movement on your job site roads and throughout your job site.
2. Manage traffic flow from your job site.
 - a. If your vehicle exits are adjacent to public traveled roads, you must control the traffic flow from your job site onto the public road. Install stop signs at all vehicle exits to control the traffic flow from your job site onto adjacent public roads.

Overhead Power Lines

1. Identify all overhead power lines on your job site & mark the location of all overhead power lines prior to beginning any work activities on your site. Discuss these hazards, if they exist, in your meetings with employees and subcontractors.

Underground Utilities – Call 811

1. Identify all underground power lines and utilities on your job site prior to any excavation work being conducted. Use Blue Stakes or a similar service to identify the approximate location of all underground utilities. Once the approximate location of any underground utility is identified, use control digging to identify the exact location of the underground utility. Also, identify the nearest shutoff(s) and emergency contact information for each utility.

Crane Operators

1. Make sure all crane operators are certified and that they carry their current certification card on them at all times they are operating a crane on your job site. Any questions, contact Chris Rongstad.
2. Make sure that all signal persons and riggers are trained and authorized by their employer to conduct signaling and rigging of cranes.

Aerial Lift & Scissor Lift Operators

1. All Zwick employees must be authorized by Chris Rongstad to operate any lifts.

Forklift Operators – Zwick & All Other

1. Make sure all forklift operators (Zwick and subcontractors) are certified and that they carry a current certification card on them at all times they are operating a forklift on your job site.

Warning Signs

1. Post all appropriate warning signs at your entrance gate, on the project fencing, at the job site trailer and, where appropriate, on your job site.

If you have any questions concerning safety and risk control on your job site, contact Chris Rongstad, Safety Director.

CHRIS RONGSTAD, SAFETY DIRECTOR CONTACT INFORMATION
CELL PHONE – 801-786-9683
E-MAIL: CRONGSTAD@ZWICKCONSTRUCTION.COM

MAILING ADDRESS:
6891 SOUTH 700 WEST, SUITE 200
SALT LAKE CITY, UT 84047

Ordering Job Site Posters – Allow 5 working days. These are ordered from a firm in California.

- Contact the Safety Director by phone or e-mail.
- Provide Superintendent Name, Phone Number
- Job Name (If multiple jobs, provide each job name),
- Job Code Number (if multiple jobs, provide each job code number),
- State Job Located In, & Number of Posters Needed.
 - If multiple states, provide states & number of posters for each state.
- Address(s) where you want the posters sent & contact name(s).

OTHER POSTINGS

The OSHA 300A poster must be posted in the job site trailer annually from February 1 to March 30. Chris Rongstad will provide the appropriate OSHA 300A poster for your job site.

ZWICK CONSTRUCTION FLEET SAFETY PROGRAM

FLEET SAFETY PROGRAM

Policy

Employees may be asked to operate company owned, leased, rental or personal vehicles as part of their jobs. Employees are expected to operate vehicles safely to prevent incidents which may result in injuries and property loss. It is the policy of Zwick Construction to provide and maintain a safe working environment to protect our employees and the neighbors of the communities where we conduct business from injury and property loss. The Company considers the use of vehicles (company owned, leased, rental or personal vehicles) part of the working environment.

Zwick Construction is committed to promoting a heightened level of safety awareness and responsible driving behavior in its employees. Our efforts and the commitment of employees will prevent vehicle incidents and reduce personal injury and property loss claims. This requires the full cooperation of each driver to operate their vehicle safely and to adhere to the responsibilities outlined in this Fleet Safety Program, while obeying all Federal, State and Local laws applying to the operation of motor vehicles.

Responsibility

Management is responsible for successful implementation and on-going execution of this program. Supervisors and employees are responsible for meeting and maintaining the standards set forth in this program subject to disciplinary action including termination.

Scope

This policy applies to employees who operate any vehicle on company business and company vehicles on personal business.

A handwritten signature in black ink, appearing to read 'D. Zwick', is positioned above the name of the signatory.

Darin Zwick, President / CEO

ORGANIZATION AND RESPONSIBILITIES

Safety Director of Zwick Construction

The Safety Director has the ultimate responsibility for successfully managing this Fleet Safety Program.

The Safety Director of Zwick Construction will:

1. Implement the Fleet Safety Program.
2. Establish measurement objectives to ensure compliance with the program.
3. Provide assistance and the resources necessary to implement and maintain the program.
4. Audit and manage compliance with regulations, and the effectiveness of the Fleet Safety Program.
5. Assess the use of vehicles and nature of territory to be covered, and formally manage routes and schedules as needed.
6. Investigate and report all incidents involving a motor vehicle subject to this policy. (Field Supervisors must forward all incident reports to the Safety Director within 48-hours.)
7. Manage all elements of this Fleet Safety Program.
8. Review motor vehicle incident reports as part of Zwick Construction Safety Review process.
9. Revise and distribute changes to this Fleet Safety Program to drivers as necessary.
10. Maintain appropriate records.
11. Monitor Federal, State and Local regulations in order to comply with all regulations and implement any policy/procedure change in a timely manner.
12. Monitor the effectiveness of this Fleet Safety Program.
13. Be responsible for taking appropriate action to manage high risk drivers as defined by this program.
14. Provide driver training either internally or through external means for high-risk drivers.

Drivers will:

1. Always operate a motor vehicle in a safe manner as explained under the section titled, "Safe Driving Rules."
2. Maintain a valid driver's license and minimum insurance requirements on personal vehi-

cles used on company business.

3. Maintain assigned vehicles according to established maintenance standards set forth by the Safety Director.
4. Report motor vehicle incidents immediately to the Safety Director.

VEHICLE USE

Company-owned Vehicles:

1. Passenger cars, SUVs, vans, pick-up trucks and other company-owned vehicles:
 - a. Only authorized drivers as defined in this program will be permitted to drive a company-owned vehicle.
2. Use of company-owned vehicles for personal use
 - a. Personal use of company-owned vehicles is prohibited unless permission is granted by management. If personal use is granted, the driver will be required to sign a Personal Use Policy.

Personal Vehicles on Company Business:

The use of motorcycles or scooters for company business is strictly prohibited.

Employees who drive their personal vehicles on company business are subject to the requirements of this program including:

- Maintain auto liability insurance with minimum limits of \$100K for bodily injury and \$100K for property damage with combined single limit of \$300K
- Maintain current state vehicle inspections, if required.
- Maintain their personal vehicle in a safe operating condition.
- Provide proof of insurance (copy of declaration page) will be sent to the Vehicle Safety Coordinator.
- Maintain an acceptable Motor Vehicle Record (MVR).
- Comply with the policies and rules set forth in this Fleet Safety Program.

Rental Vehicles:

Vehicles may be rented for company business under certain circumstances with prior approval. All rental vehicles will be arranged by the corporate office of Zwick Construction.

Unauthorized Use of Company Vehicles:

Authorized drivers will not allow an unauthorized individual to operate a company vehicle. Additionally, if unauthorized use results in a motor vehicle incident, the responsible employee is assumes all damages and liability.

AUTHORIZED DRIVER SELECTION

Driver Evaluation:

Drivers will be selected based on their driving ability, past driving history, driving record and compliance with this Fleet Safety Program. To evaluate employees as authorized drivers, the Safety Director will:

1. Review past driving performance and work experience through previous employer reference checks.
2. Review the employee's Motor Vehicle Record (MVR) in accordance with applicable privacy laws. Compare the employee's MVR to the guidelines listed in the Driver Qualification section below.
3. Ensure the employee has a valid driver's license.

Driver Qualification:

1. The Safety Director has developed and incorporated the following standards into this program, which reflect the skills necessary for satisfactory job performance, while taking into consideration applicable Federal and State regulations.
2. The employee's MVR will be reviewed annually by the Safety Director
3. Authorized drivers must notify the Safety Director immediately if their license is suspended or revoked.
4. All authorized drivers will be monitored for regular compliance with the procedures, policies and rules in this Fleet Safety Program. In addition to a MVR review, the Company may conduct direct observation of driving skills. The Company will also consider any feedback, positive or negative, from the general public.
5. All authorized divers will be required to report a motor vehicle incident to the Safety Director immediately.
6. The following criteria has been established to identify acceptable drivers based on the annual review of the employee's MVR:
 - Have no more than three moving violations in the past three years
 - Have no more than two motor vehicle incidents in the past three years
 - Have no serious violations in the past five years
 - i. Examples of moving violations include, but are not limited to: Speeding, failure to obey traffic

control devices, driving too fast for conditions, improper lane changes, and failure to yield

- ii. Examples of serious violations include, but are not limited to: Driving under the influence of alcohol or drugs (DWI/DUI), hit and run, failure to report a motor vehicle incident, negligent homicide arising out of the use of a motor vehicle, operating during a period of suspension or revocation, using a motor vehicle for the commission of a felony, operating a motor vehicle without the owner's authority, permitting an unlicensed person to drive, and reckless driving.
7. Drivers who are identified as high risk are subject to several actions from the company including, but not limited to:
- Driver may be required to attend a Defensive Driving or Safety Driving course on their own time and at their own expense.
 - Driver may have their driving privileges suspended or revoked.
8. Documentation of the qualification of each driver will be maintained by Zwick Construction. Also, records will be kept regarding the driver's training. Examples of items to be kept in the driver's qualification and/or personnel files include:
- Job application
 - Copy of MVR's
 - Driver training records
 - Copy of current driver's license
 - Notice from the Department of Motor Vehicles

INCIDENT REPORTING & ANALYSIS

Reduction in Motor Vehicle Incidents:

It is a goal of the Company to eliminate motor vehicle incidents. This pertains to incidents under the operation of company-owned or leased vehicles, whether the vehicle is being driven on company business or for personal use, and the operation of rental or driver-owned vehicles used for business purposes. To meet this objective, all motor vehicle incidents will be reported to the Safety Director, investigated, documented and reviewed by the Safety Director.

Responsibility:

Implementation of these procedures remains the responsibility of the Safety Director.

Authorized Drivers:

Authorized drivers are required to report all incidents to the Company, regardless of severity. All incidents should be reported as soon as possible, preferably within 24-hours or by the end of the business day. Since the driver is the first person at the incident scene, he/she is responsible to control the accident scene, initiate the information-gathering process as quickly and thoroughly as is feasible in accordance with this program.

Preventable/Non-Preventable Incidents:

The following definitions relate to motor vehicle incidents:

1. A motor vehicle incident is defined as any occurrence involving a motor vehicle which results in death, injury or property damage, unless such vehicle was properly parked. Who was injured, what property was damaged and to what extent, where the incident occurred, or who was responsible, are not relative factors.
2. A preventable incident is defined as any incident involving the vehicle which results in property damage or personal injury and in which the driver failed to do everything he/she reasonably could have done to prevent or avoid the incident.
3. The determination of preventability of an incident is the function of the Safety Director.

AUTHORIZED DRIVER INCIDENT REPORTING

Injuries to Persons and/or Damage to Other Vehicles or Property:

Employees will take the following actions when there are injuries to persons and/or damage to other vehicles or property:

1. If possible, move the vehicle to a safe location, out of the way of traffic. Call for medical attention if anyone is hurt.
2. Secure the names and addresses of drivers and occupants of any vehicles involved, their operator's license numbers, insurance company names and policy numbers, as well as the names and addresses of injured persons and witnesses. Record this information on the Incident Report form (in the reporting packet.) Do not discuss fault with, or sign anything for anyone except an authorized representative of Zwick Construction, a police officer, or a representative of Zwick Construction's insurance company.
3. Immediately notify the Safety Director.
4. You will be contacted by the Safety Director to advise you how to arrange for repairs to the vehicle. Do not have the vehicle repaired until you receive authorization from the Safety Director.
5. All external communications (e.g. to the media, regulatory agencies) will be performed only by the Safety Director.
6. All authorized drivers will be required to submit to a drug screen under the Zwick Construction drug screen policy following any motor vehicle accident, no matter who is at fault. The drug screen must be performed within 24 hours following the accident.

Theft of or Damage to Any Vehicle used on Company Business:

If there is damage to the vehicle or your vehicle is stolen, you must notify the local police department immediately.

1. Immediately notify the Safety Director.
2. You will be contacted by the Safety Director to advise you how to arrange for repairs or replacement of the vehicle. Do not have the vehicle repaired until you receive authorization from the Safety Director.
3. Send a copy of the police report along with a memo outlining any additional information to the Safety Director.

Incident Reporting Kits:

1. Every company vehicle will have an incident reporting kit in the glove box. This will include an Incident Report Form, pen or pencil, and an inexpensive or disposable camera, if the employee does not have a business cell phone that can be used as a camera.

VEHICLE SELECTION, INSPECTION & MAINTENANCE

Introduction:

Proper selection and maintenance of equipment are important aspects of this program. Reduced operational costs and incidents from vehicle defects are the direct result of a well implemented maintenance policy. The condition of company-owned vehicles is a direct reflection on the Company and is a condition of employment for authorized drivers.

Vehicle Modifications:

Employees should not modify company vehicles without written permission from the Safety Director. Modifications may create an unsafe condition and/or circumvent the function of a safety device. Modifications that require written permission include but are not limited to:

- Trailer hitches
- Stereo equipment
- Window tinting
- Navigation systems
- Security systems
- Accessibility aids
- Cargo containment or racks
- Material handling means
- Mobile telephone attachments
- Changing tire or rim size

- Modifying the suspension
- Changing body configuration
- Increasing the carrying/hauling capacity of the vehicle trailer.

Vehicle Inspections:

The authorized driver responsible for the vehicle will inspect the vehicle on a daily basis --- a walk around inspection --- and in accordance with company policies and procedures. In addition to documented maintenance inspections, drivers should make regular visual checks each time the vehicle is to be operated.

Emergency Equipment:

Each company-owned vehicle will be equipped with appropriate emergency equipment in the event the driver experiences mechanical difficulty, loss or shifting of load or a crash on the road. Examples of emergency equipment to be considered include reflective triangles/flare, fire extinguisher, first aid kit, flashlight, and a reflective safety vest.

Vehicle Maintenance:

1. At a minimum, vehicles should be inspected in accordance with the vehicle manufacturer's recommendations, after notice of a manufacturer recall, and in accordance with best management practices.
2. All company-owned vehicles shall be maintained by qualified automotive technicians with the requisite skills obtained through experience and/or training. The maintenance should be done at regular intervals based upon miles driven, hour of operation and/or calendar time. When defects are reported, the vehicle should be repaired before the vehicle is placed back in service with appropriate records maintained.
3. All company-owned vehicles will be maintained by an approved vendor with the appropriate facilities and service equipment necessary to perform the required tasks. When maintenance is performed by vendors, the Company shall assess the vendor's ability to adequately perform the required service.

Recordkeeping:

Employees will forward all vehicle maintenance records for maintenance performed each month on company-owned vehicles to the Safety Director.

SAFE DRIVING RULES

The Company has developed these key driver safety rules that all employees who drive on company business need to follow. These rules may be modified, or additional driver rules may be created, as a need is identified by Zwick Construction. Drivers found to be in violation of these rules will be counseled, retrained and/or disciplined in a fair and consistent manner.

Authorized drivers are expected to drive courteously, professionally and defensively at all times. Your driving directly reflects on the Company.

Safety Belts

The authorized driver and all occupants are required to wear safety belts when the vehicle is in operation. The authorized driver is responsible for ensuring passengers wear their safety belts.

Impaired Driving

The authorized driver must not operate a vehicle at any time when his/her ability to do so is impaired, affected, influenced by alcohol, illegal drugs, prescribed or over-the-counter medication, illness, fatigue or injury. These behaviors will not be tolerated.

Traffic Laws

Authorized drivers must abide by the Federal, State motor vehicle regulations, laws and ordinances.

Vehicle Condition

Authorized drivers are responsible for ensuring the vehicle is maintained in a safe driving condition. Drivers of rental vehicles should check for obvious defects before leaving the rental office/lot and, if necessary, request another vehicle if the first vehicle is deemed unsafe by the employee.

Cellular Telephones and other Electronic Communication Devices

Use of a cell phone or other electronic communications devices by the driver while the vehicle is in motion is prohibited.

Other Distracted Driving Items

In addition to limiting the use of cell phones and other electronic communications devices, the Company recognizes that there are other distractions in vehicles that can lead to crashes. The following distractions should be avoided while your vehicle is in motion:

- Eating / drinking
- Grooming
- Smoking
- Reading
- Use of technology, such as GPS and computers (location details should be programmed in prior to the start of the trip so that the driver does not need to adjust while driving)

- Attending to passengers

Aggressive Driving/Road Rage:

Aggressive driving by you, or another vehicle on the road, can lead to a crash. Aggressive driving includes speeding, excessively slow driving, driving outside the flow of traffic, controlling traffic, tailgating, failure to signal a lane change, running red lights and stop signs, weaving in traffic, yelling, making obscene gestures and excessive use of the horn. The behaviors can escalate to road rage, which can increase the frequency and severity of auto crashes. Road rage will not be tolerated.

General Driving Safety Rules:

Employees are not permitted to:

- Pick up hitchhikers.
- Offer rides to any non-employee
- Accept payment for carrying passengers or materials.
- Use any radar detector, laser detector or similar devices.
- Push or pull another vehicle or tow a non-company-owned trailer.
- Transport flammable liquids or gases unless a DOT or Underwriters' Laboratories approved container is used, and only then in limited quantities.
- Assist disabled motorists or incident victims beyond their level of medical expertise. If a driver is unable to provide the proper medical care, he/she must restrict his/her assistance to calling the proper authorities. Your safety and well-being shall be protected at all times.

When transporting loads such as tools, materials or equipment, etc. for company business, either in the cab or in the bed of the vehicle, or on a trailer, the driver is responsible for making sure that the loads being transported are adequately secured.

Company and Personal Property

Employees are responsible for company property, such as, computers, work papers and equipment while under their care, custody or control. Zwick Construction will not reimburse the employee for stolen personal property.

Defensive Driving Techniques

It is your responsibility to drive defensively and prevent accidents when operating a motor vehicle on company business. Defensive driving is a positive approach that follows a simple formula:

- Get information (identify potential hazards)

- Give information (let others know your intentions)
- Act appropriately (maintain a safety barrier around your vehicle)

A defensive driver is constantly monitoring and evaluating the driving situation, making necessary adjustments to be prepared for any situation. The following defensive driving habits will help prevent vehicle crashes:

- Constantly scan traffic conditions ahead, to each side and behind you.
- Use your communication devices, such as, brake lights, turn signals and four-way flashers to ensure other road users know your intended actions.
- Keep your mind on your driving. Distracted driving is one of the leading causes of highway crashes.
- Drive at a speed consistent with road, weather and traffic conditions.
- Use accelerator and brakes smoothly.
- Use your horn as a warning signal only. Do not assume it will stop or correct a potentially dangerous situation.
- Slow down before you enter a curve and accelerate gradually as you round it.

QUESTIONS / CONCERNS

All questions or concerns regarding the fleet safety policy should be directed to Chris Rongstad, Safety Director.

FLEET POLICY AND COMPANY VEHICLE AGREEMENT

The undersigned hereby acknowledges receipt of a copy of the Zwick Construction Fleet Safety Program.

I have read and agree to abide by the provisions of the Zwick Construction Fleet Safety Program

EMPLOYEE NAME (PRINT)

EMPLOYEE SIGNATURE

DATE

VEHICLE ASSIGNED: _____ if applicable

VIN NUMBER: _____ if applicable

PLATE NUMBER: _____ if applicable

MILEAGE: _____ if applicable

CONSIDERATIONS DURING AN INCIDENT REVIEW

During a review of a motor vehicle incident, possible contributing factors may be considered using the following framework:

Driver

- Driver's work schedule for at least the week preceding the incident
- Length of time on duty since the previous break prior to the incident
- Fatigue
- Scheduling demands on driver
- Motor vehicle record (MVR) history
- Physical condition of the driver at the time of the incident
- Physical limitations of the driver at the time of the incident
- Driver training history
- Driver's emotional state

Vehicle

- Maintenance and inspection records
- Vehicle condition
- Damage to the vehicle from the incident
- Suitability and safety of the vehicle for the work task
- Modifications to the vehicle that may have contributed to the incident

Operating Environment

- Weather
- Road conditions
- Traffic conditions
- Route planning

POLICY FOR PERSONAL USE OF A COMPANY-OWNED VEHICLE

Vehicles are provided primarily for use on company business. Any exceptions to this policy will be authorized by the Safety Director. Certain exceptions are permitted. Examples of such use include:

- Personal errands while in route to or from a business related activity, provided that the errand is done on the driver's own time (e.g. authorized break or lunch hour)
- Commuting to and from work

In addition, the following requirements pertain to all company-owned vehicles:

- No one except for an authorized employee may drive a company-owned vehicle. This includes immediate family members and friends.
- Drivers must comply with all applicable Federal, State and Local laws and regulations
- No alterations to company-owned vehicles are permitted. For example, no installation of stereos, radar detectors, trailer hitches, bike or kayak racks, window tinting, running boards, bug deflectors, visors, personalized vanity license plates, bumper stickers, decals, gun racks, etc.
- Use of personal trailers on company-owned vehicles are prohibited.

Zwick Construction reserves the right to withdraw or modify this privilege at any time.

I, _____, have read and understand the *Personal Use of a Company-owned Vehicle Policy*.

I agree to abide by the provisions of this policy.

I understand that violation of this policy will result in disciplinary action, up to and including termination of employment.

Driver Name (print)

Driver Signature

Safety Director Signature

Date

Date

ZWICK CONSTRUCTION

SUBSTANCE ABUSE POLICY

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SCOPE OF POLICY

This document contains procedures for the drug and alcohol testing program at Zwick Construction. Zwick Construction prohibits the use, possession, sale, purchase, manufacture, distribution, transfer or consumption of alcohol and all illegal drugs, including legally regulated drugs.

This program applies to all employees and potential employees of Zwick Construction, as well as subcontractors at all tiers, including non-bargaining and bargaining unit employees.

DEFINITIONS

Banned Substances: Illegal substances, as defined by federal/state laws, including:

1. Amphetamines
2. Opiates
3. Phencyclidine (PCP)
4. Cocaine
5. THC (Marijuana/Cannabinoids)
6. Benzodiazepines
7. Methadone
8. Methaqualone
9. Barbiturates
10. Propoxyphene
11. Fentanyl
12. Meperidine
13. Nalbuphine
14. Oxycodone
15. Pentazocine

Third-Party Administrator: Zwick Construction may retain a third-party administrator to perform testing and reporting procedures. See Appendix A: Additional Definitions.

POLICIES AND PROCEDURES

A urine drug screen shall be administered under the following circumstances.

1. **Pre-Hire Drug Screening.** All potential employees must submit to a urine drug screen no later than the commencement of employment. Pre-hire drug screening will test for the presence of illegal drugs and substances and the illegal use of prescription drugs. This screen does not include an alcohol test. Potential employees who refuse to submit to this test will not be permitted to work for Zwick Construction.

If the employer participates in a pre-screen/certification program through a collective bargaining agreement (CBA) or other arrangement, and the potential employee has undergone a prior screening to which, through the CBA or other arrangement, Zwick Construction is provided access to the results/certification, then the potential employee shall be deemed to have complied with Zwick Construction's pre-hire drug screening requirements.

1. **Existing Employees.** Existing employees who are transferred from another location must submit to a urine drug screen prior to entering the jobsite. This screen tests for the presence of illegal drugs and substances and the illegal use of prescription drugs. This screen does not include an alcohol test. Employees who refuse to submit to this test will not be permitted to work for Zwick Construction.

If the employer participates in a pre-screen/certification program through a CBA or other arrangement, and the employee has undergone a prior screening to which Zwick Construction has access to the results/certification, then the employee shall be deemed to have complied with Zwick Construction's pre-hire drug screening requirements. Likewise, if an employee has undergone a urine drug screen with Zwick Construction within the previous three (3) months, and Zwick Construction deems this test sufficient, then the employee shall be deemed to have complied with Zwick Construction's pre-hire drug screening requirements.

1. **Testing for Cause.** All employees may be tested for cause when a reasonable suspicion exists that the employee appears to be under the influence of illegal drugs or illegally using prescription drugs, synthetic drugs and/or alcohol.
2. **Causal/Incident-Related.** All employees who are involved with, or may have contributed to, an incident that results in property damage or requires treatment beyond onsite first aid are required to submit to a drug screen and alcohol test. (Note: a company may also require a drug screen and/or alcohol test for incidents resulting in first aid treatment. Please consult your state/local laws pertaining to testing procedures to verify if such a practice is permissible).
3. **Random.** When permitted by state law, employees may be randomly selected for unannounced drug and alcohol screening using a scientifically/statistically valid computerized number generation process. Employees are notified of selection no more than 48 hours prior to testing.
4. **Reinstatement.** Return-to-Duty and Follow-Up Testing. Existing employees who fail a drug or alcohol screen are subject to immediate disciplinary action up to and including immediate termination of employment. Employees who are terminated will not be eligible for rehire for a full 180 days from the date of their termination.

TESTING PROCEDURES

I. DRUG SCREENING OF APPLICANTS FOR EMPLOYMENT

1. Upon entering the jobsite or workplace, all applicants will proceed to the project office or trailer. They will be advised whether specimen collection will occur onsite in an approved facility or at an approved clinic offsite.
2. Each applicant will read and sign a Drug Screen Consent Form prior to any test being administered.
3. On a pre-printed, itemized form furnished by the employer, each applicant will be asked to identify any medication he/she is taking or has taken during the 30 days preceding the test.
4. A formal chain of custody will be established for every drug screen.
5. A split sample consisting of two urine collection containers sealed in a plastic container will be furnished to the applicant. (Note: Testing may be performed by a third-party administrator.) The containers must contain an amount of urine sufficient for one Enzyme Medical Immunoassay Test (EMIT) and two Gas Chromatography/Mass Spectrometry (GC/MS) tests (no less than 2 ounces of urine per container). Each applicant's urine specimen will be collected and temperature tested for verification. The second container will be used in the event the first container becomes contaminated.
6. Before the specimen leaves the applicant's sight, the urine containers will be sealed with security tape that has been initialed by applicant.
7. Specimens collected onsite will be transported to a laboratory in accordance with the chain of custody procedures. A portion of the sample will be tested using the EMIT; if positive, another portion and/or the split sample will be tested for verification using the GC/MS test.
8. The remainder of the urine specimen and split sample will remain at the laboratory for 30 days following the test.
9. Upon signing a form giving consent to use the urine sample for drug screening, the applicant is eligible for employment on a 72-hour probationary basis. This consent form is co-signed by the collection specialist.
10. Any applicant who refuses to submit to a drug screening will not be eligible for employment.
11. The employer receives the drug test results within 72 hours. If the applicant's test results in a confirmed positive, as confirmed by a medical review officer (MRO), he/she will be terminated immediately and paid for all hours worked, if permissible by state/local law. The individual will not be eligible for employment with the employer for a period to be determined by the employer, not exceeding one year. If hired later by the employer, and contingent on a negative drug screen, the employee may be tested periodically

without notice for a period of up to one year from the date of hire.

12. If any individual who has tested positive by the MRO wants to confirm the results of the GC/MS test, he/she may do so by having a GC/MS test performed on the previously collected split urine specimen at a certified National Institute on Drug Abuse (NIDA) or Substance Abuse and Mental Health Services Administration (SAMHSA) laboratory of his/her choice. The specimen will be shipped directly from the employer's lab to the lab of the employee's choice. The costs of this test will be borne by the employee. If the results of this test are negative, the individual will be reinstated with full back pay and benefits, and will be reimbursed for the cost of the test. The individual must exercise the option of a second GC/MS test within 24 hours of being notified of the positive results.
13. Pre hire drug screens include tests for at least the following (a ten-panel drug screen):
 - a. Amphetamines
 - b. Opiates
 - c. Phencyclidine (PCP)
 - d. Cocaine
 - e. THC (Marijuana/Cannabinoids)
 - f. Benzodiazepines
 - g. Methadone
 - h. Methaqualone
 - i. Barbiturates
 - j. Propoxyphene
 - k. Fentanyl
 - l. Meperidine
 - m. Nalbuphine
 - n. Oxycodone
 - o. Pentazocine

Zwick Construction reserves the right to administer testing for additional substances.

II. DRUG SCREENING OF TRANSFERRED EMPLOYEES

The procedure for testing employees transferred from another jobsite is the same as the pre-hire procedure.

III. "FOR CAUSE" TESTING PROCEDURES

1. All employees working for Zwick Construction may be tested for illegal drugs, substances, synthetic drugs and alcohol if there is reasonable suspicion that the employee is under the influence of alcohol, any of the substances identified in paragraph 13 or abuse of prescription medication. For the purpose of this program, the term "reasonable suspicion" shall be defined as "aberrant behavior or unusual on-duty behavior of an individual employee who:
 - a. is observed on duty by either the employee's immediate supervisor, higher ranking employee, or other managerial personnel who have been trained to recognize the symptoms of drug abuse, impairment or intoxication (observations shall be documented by the observers);
 - b. exhibits the type of behavior that shows accepted symptoms of intoxication or impairment caused by controlled substances or alcohol or addiction to or dependence upon said controlled substances; and
 - c. Such conduct cannot reasonably be explained by other causes such as fatigue, lack of sleep, side effect of prescription or over-the-counter medications, illness, reaction to noxious fumes or smoke.
2. Testing of this type will not be conducted without the written approval of Zwick Construction's Safety Director. The jobsite superintendent or designated manager must document in writing who is to be tested and why the test was ordered, including the specific objective facts constituting reasonable suspicion leading to the test being ordered, and the name of any source(s) of this information. One copy of this document shall be given to the employee before he/she is required to be tested. After receiving a copy of the document, the affected employee shall be given enough time to read the document.
3. When a supervisor or other managerial personnel has reasonable suspicion to believe an employee is using, consuming or under the influence of an alcoholic beverage, non-prescription controlled substance (other than over-the-counter medication), and/or non-prescribed narcotic drug while on duty, that person will notify the jobsite superintendent or designated manager for the purpose of observation and confirmation of the employee's condition. The employee will be given an opportunity to explain his/her condition, such as reaction to a prescribed drug, fatigue, lack of sleep, exposure to noxious fumes, reaction to over-the-counter medication or illness. If, after this explanation, the jobsite superintendent or designated manager continues to have reasonable suspicion that the employee is using, consuming and/or under the influence of an alcoholic beverage, non-prescribed controlled substance or non-prescribed narcotic while on duty, then, by a written order signed by the Safety Director, the employee may be ordered to immediately submit to a drug and alcohol screen. Refusal to submit to testing after being ordered to do so may result in disciplinary action up to and including discharge.
4. Employee drug screens for cause will include testing for alcohol, as well as the same drugs as the pre-hire screening test. Each employee will read and execute a consent form prior to any test being administered. Failure to execute the consent form will result

in termination.

5. Reasonable suspicion testing shall be performed at a NIDA/SAMHSA-approved clinic. The individual will be immediately accompanied to the clinic by a company representative. Samples will be taken as per the pre-hire procedure.
6. An EMIT test and, if positive, a confirming GC/MS test, will be performed on the urine sample. The remainder of the sample and the split sample will be stored at the laboratory for 30 days.
7. If an employee's test is positive, his/her employment will be terminated immediately. The employee will be given a copy of the results of the drug screen. He/she may have the second container tested at his/her own expense as per the pre-hire procedure.
8. Alcohol detection will be based on a evidential breath alcohol device approved by the National Highway Traffic Safety Act. If an employee's test results indicate he/she is legally intoxicated at or above the state of jurisdiction's legal limit, he/she may be subject to discipline up to and including discharge.

IV. CAUSAL/INCIDENT-RELATED TESTING

Subject to applicable law and consistent with reasonable suspicion, Zwick Construction reserves the right to require its employees to present themselves for testing within 24 hours following an employee's involvement in an accident, near accident or an incident resulting in lost work time, property damage, and/or injury to any employee or other person while on Zwick Construction's premises, on the job or otherwise working for Zwick Construction.

V. RANDOM TESTING

Subject to applicable state law, Zwick Construction reserves the right to require its employees to present themselves for random, unannounced testing. Zwick Construction will adopt an objective procedure, using a statistically valid number generation process, to randomly select employees to be tested. Upon anonymous selection, Zwick Construction will notify the employee(s) to report immediately for drug testing. Zwick Construction solely determines the time and frequency of random drug tests. Any employee may be selected for random testing in accordance with state/local laws. An employee could be randomly selected for testing more than once a year.

VI. REINSTATEMENT, RETURN-TO-DUTY AND FOLLOW-UP TESTING/REHABILITATION PROGRAMS

Zwick Construction maintains a referral relationship with drug and alcohol abuse services. Additionally, certain health insurance benefits may provide help to employees who suffer from substance abuse and/or other personal or emotional problems; however, it is the responsibility of each employee to seek necessary professional assistance before alcohol and drug problems lead to disciplinary action.

If Zwick Construction mandates a sponsored rehabilitation program, the employee will be subjected to a drug screen following the procedures outlined in Section I (Drug Screening of Applicants for Employment) prior to reinstatement. In addition, per post-rehabilitation program monitoring guidelines, Zwick Construction may subject the employee to follow-up testing for a period to be determined in cooperation with the rehabilitation program and employer. Testing will follow the procedures outlined in Section V (Random Testing).

VII. DRUG AND ALCOHOL TESTING REQUIREMENTS FOR EMPLOYEES WITH A COMMERCIAL DRIVER'S LICENSE (CDL)

The United States Department of Transportation (DOT) requires that all employees maintaining a CDL and operating commercial motor vehicles be subjected to the drug screen policies outlined in the "Testing Procedures" section of this document. CDL employees, per the DOT, are required to submit to a minimum five-panel drug screen for the presence of:

1. Amphetamines
2. Opiates
3. Phencyclidine (PCP)
4. Cocaine
5. THC (Marijuana/Canabinoids)

A positive test result requires the employee to be immediately removed from operating any commercial motor vehicles on public roadways. In addition, employees whose test produces a positive result must complete return-to-duty and follow-up testing after completion of an approved rehabilitation program as prescribed by a substance abuse professional. Follow-up testing must include a minimum of six unannounced, directly observed drug screens within 12 months of the initial return-to-duty screen following the procedures outlined in Section V (Random Testing).

VIII. DISCIPLINARY POLICIES AND PROCEDURES

First Offense

Existing employees who fail a drug or alcohol screen are subject to immediate disciplinary action up to and including immediate termination of employment. Employees who are terminated will not be eligible for rehire for a full 180 days from the date of their termination.

Appealing Disciplinary Action

Existing employees who fail a drug or alcohol screen may appeal the disciplinary action prescribed by Zwick Construction directly to Darin Zwick who will make the final decision.

Substance Abuse Rehabilitation

Following a positive result, Zwick Construction retains the right to allow the employee to voluntarily enter into an approved substance abuse rehabilitation program under their own expense. Upon completion of the program, the employee will be subjected to drug screening procedures outlined in Section VI (Reinstatement, Return-to-Duty and Follow-Up Testing/Rehabilitation Programs).

IX. POLICY AMENDMENTS

Review Procedures

Zwick Construction will undertake a comprehensive review of the policy every two years. A review panel to be named at the time of the review, will assess the relevance and current status of the policy's components, as well as incorporate updated procedures and requirements that will ensure the policy meets or exceeds industry requirements. Any policy changes made as a result of the review will be made available and provided to every employee as an addendum to Zwick Construction's Employment Policies and Procedures.

In addition to the policy update, Zwick Construction may undertake revisions due to new regulatory requirements. Any revisions made outside the review will be provided as a separate addendum to all employees.

X. CONFIDENTIALITY STATEMENT

Employee information, including drug screen results and rehabilitative programs, will be treated as medical records and will remain strictly confidential following HIPAA guidelines for patient confidentiality. Employee requests to release the results of drug screens to any party outside Zwick Construction must be made in writing to the Safety Director.

ZWICK CONSTRUCTION EMPLOYEE CONSENT FORM

Pre Hire

_____ Release form for obtaining urine samples for drug screening and permission to furnish the results to Zwick Construction.

For Cause

_____ Release form for obtaining urine samples for drug screening and permission to furnish the results to Zwick Construction.

_____ Release form for obtaining NHTSA-approved evidential breath alcohol test and permission to furnish the results to Zwick Construction.

Post Incident

_____ Release form for obtaining test samples for drug and alcohol screening following any incident requiring medical care.

I hereby authorize Zwick Construction, its physicians or agents, to take the indicated sample from me to use for the purposes indicated above. I understand why these samples are being requested and I give permission for the results to be released to Zwick Construction and to my employer (if different).

I further release and hold harmless the owner, Zwick Construction and its subcontractors from any consequences arising out of the drug and/or alcohol test or results therefrom.

Name (please print)

Social Security Number

Signature (required)

Date

Street

City

State

Zip

Phone Number (with area code)

Witness

Date

Employer

Occupation

