

ATTACHMENT (E)

Subcontractor Safety Program

I. Purpose

The Subcontractor Safety Program is designed to protect Contractor and contractor employees, equipment and facilities from injury, accident or loss. Subcontractors are persons not directly employed by the company who provide specific labor or services.

As a condition of doing business with Samet Corporation all subcontractors must comply with this program, applicable local, state and federal safety and health regulatory requirements and Contractor project safety rules and policies.

As a condition of doing business with Samet Corporation all subcontractors will participate with Samet Corporation in achieving and maintaining North Carolina Department of Labor Building Star Program requirements. This process will include but not limited to working with OSHA consultants who will help your company improve your safety program. Specific compliance is required in the following:

II. Responsibilities

Management

1. Ensure contracts for bids contain appropriate information concerning the Subcontractor Safety program including all requirements
2. Provide access to MSDS material upon request of subcontractors
3. Monitor all subcontractor activities at the jobsite
4. Ensure common areas in which the subcontractor employees are working are maintained safe and free of hazards
5. Provide subcontractors with specific safety program requirements
6. Conduct daily safety inspections of the work sites
7. Implement an effective system for promptly correcting hazards
8. Safety Director will ensure a comprehensive safety orientation is held for all subcontractors prior to beginning work.

Subcontractors

1. Competent Person/Foreman shall attend a comprehensive safety orientation prior to beginning work.
2. Conduct daily documented safety inspections of all assigned areas.
3. Subcontractors engaged in trenching operations shall inspect trenches daily that are 5 feet or greater in depth and obtain a trench permit from Superintendent.
4. Identify and correct hazards.
5. Correct safety or health violations discovered by Contractor.
6. Provide your employees with required personal protective equipment.
7. Ensure Subcontractor Employees have the proper training for assigned tasks.
8. Coordinate with Samet's Safety Director for safety related issues.
9. Maintain required insurance coverage.
10. Establish and maintain an effective written Safety and Health Program.
11. Establish and maintain an effective Housekeeping Program
12. Establishment and maintain an effective written Hazardous Communication Program.

Minimum Insurance Requirements

In accordance with paragraph (7) of the subcontract agreement, subcontractors are required to meet minimum Insurance Requirements according to the following schedule:

Coverage Minimum per Occurrence Limits

See Article 15 – Insurance, Indemnity and Bonds

Certificates of Insurance (Sample of certificate attached)

See Article 15 for additional insured requirements

III. Training

Subcontractor's Competent Person shall attend a comprehensive safety orientation on site prior to beginning work. The Competent Person shall provide to the Superintendent a copy of his company's written safety and hazards communication programs. Subcontractors are required to instruct their employees in the recognition and avoidance of unsafe conditions and the regulations applicable to their work environment to control or eliminate any hazards or other exposure to illness or injury.

Required Training for Subcontractor Employees

Project Safety Rules, including reporting of unsafe conditions ; Hazard Communication & chemical safety; Lockout- Tagout (as applicable); Electrical Safety; Evacuation Routes, Alarms & Procedures; Hot Work Program (as applicable); Confined Space Program (as applicable); Personal Protective Equipment; Fall Protection; Ladder Safety; Weekly Toolbox Safety Talks; Aerial lifts (as applicable); Powder actuated tools (as applicable)

IV. Safety Reviews

All task specific safety concerns shall be addressed and resolved prior to commencement of work by the subcontractor. Superintendent may require subcontractor's competent person to conduct a safety task analysis prior to beginning work. Applicable forms are attached to the site specific safety program.

Hazardous Chemical/Substance Notification

Contractor must follow the OSHA Hazard Communication Standard requirements including use, safe handling, labeling and storage of chemicals. **Subcontractors are required to submit to the project superintendent a copy of their written Hazardous Communication Program and material safety data sheets (MSDS) prior to starting work.** All spills and leaks of hazardous chemicals must be immediately reported to the Samet's Safety Director.

Welding & Hot-Work Permit Program

All hot work and welding operations in an enclosed building must be conducted under the control of a Hot Work Permit. Subcontractors must receive a hot work permit from the project superintendent prior to starting any welding or cutting operations inside an enclosed building structure.

Confined Space Entry

Subcontractor employees are not authorized to enter any confined spaces on the project site until the space has been tested and determined to be safe for employees.

Work at Elevated Locations

Subcontractors engaged in all **steel erection activity** including structural steel, pre-cast walls, miscellaneous steel construction , **roofing work and wood framing** shall submit a project specific written Fall Protection Plan to the Project Superintendent no later than 10 working days prior to starting work and shall be reviewed by the Safety Director and Superintendent. This plan shall address identification, evaluation, and prevention of employee fall exposures of six feet or more. The plan shall also address training for project specific fall hazards. The plan shall meet or exceed minimum OSHA fall protection requirements contained in 29 CFR 1926 subpart M and R. The plan shall address fall protection risk exposures on this project in a manner acceptable to Samet Corporation. Samet Corporation will accept only full body harnesses as a personal fall arrest system.

All other employees who will be working in articulating boom lifts will wear personal fall arrest systems and attach lanyard to an approved anchor point on the lift. All employees working in **Scissor Lift Platforms** are not required to wear a personal fall arrest system if they are on the working platform. However, if an employee gets out of the lift he must be protected by the use of a personal fall arrest system. The employee will not use the rails of the lift as an anchor point only approved anchor points shall be used.

Steel erector shall install perimeter safety cables as applicable under Subpart R of the steel erection standard. The cables shall consist of 3/8" wire rope installed at 45 inches above finished floor and at the midpoint between the finished floor and the top cable during structural steel assembly. Safety cables shall be maintained tight and top cable shall not deflect below 39 inches. Upon completion of steel erection activities, safety cables shall remain in place and Samet Corporation after inspection of the cables shall assume custody of fall protection.

Work on Scaffolds

Subcontractor shall identify a competent person in charge of erecting and dismantling all scaffolds. The competent person shall ensure that the scaffold is erected and used according to OSHA regulations (29 CFR 1926 subpart L- Scaffolds) and Codes of Safe Practice (Scaffold Industry Association). All subcontractor employees working on a scaffold greater than ten (10') feet above a lower level shall be protected from falling by either a standard guardrail system or personal fall arrest system. Subcontractors who erect scaffolds 10 feet or greater in height will inspect the scaffold daily and document the inspection using scaffold inspection tags.

Other Policies and Procedures

All contractor employees shall adhere to all other Samet Policies, including but not limited to: access to company facilities, company equipment, use of controlled substances, firearm & explosive restrictions, harassment of other persons, traffic and parking regulations.

- All personnel on Samet construction sites shall wear hard hats and safety glasses in the designated work zone at all times. Conditions for wearing personal protective equipment are discussed during the subcontractor's job site safety orientation meetings. Additional personal protective equipment requirements including but not limited to wearing of reflective vests or high visibility clothing shall be determined by Samet Corporation onsite construction team prior to commencement of work activities.
- All subcontractors engaged in steel erection activities shall submit a site specific erection plan to superintendent prior to beginning steel erection activities.
- All subcontractors engaged in digging trenches greater than 5 feet deep shall identify the competent person to the superintendent. The competent person shall perform daily inspections of the trench and comply with 29 CFR 1926 subpart P, Excavations and obtain a trench permit.
- All workers on Samet construction sites shall abide by the posted Samet Project Safety Rules. Workers who fail to adhere to the posted safety rules shall be disciplined. Disciplinary procedures will be outlined in the project's site specific safety policy.
- Subcontractor's competent person shall notify superintendent if guardrails are removed for access of material and etc. Upon completion of activity, subcontractor shall put back the guardrails. Failure to put back the rails will lead to disciplinary procedures.
- Subcontractors who hire 2nd tier subcontractors to perform the scope of work outlined in their contracts shall notify superintendent prior to beginning work. Additionally, subcontractors shall orientate their subcontractors to ensure they understand and follow posted Project Safety Rules and notify superintendent that their orientation has been completed.
- All flexible cords used to power portable power equipment, tools and charge aerial lifts shall be a 3 wire type and #14 AWG or greater and rated hard use or extra hard use. All flexible cords plugged into a generator with an output of 5KW or greater and all flexible cords plugged into the permanent wiring of the building shall be protected by a ground fault circuit interrupter (GFCI).
- All workers engaged in dry cutting and chipping concrete, masonry materials and mixing mortar shall wear approved respiratory protection and when feasible shall wet cut masonry materials. Workers engaged in drilling rock and demolition of concrete and masonry materials shall wear approved respiratory protection.