

2.23.23

## PERSONAL PROTECTIVE EQUIPMENT (PPE) POLICY

**WE GEAR UP FOR SAFETY.**

There's simply no excuse for employee-owners to expose themselves or others to senseless risk. That's why we've implemented a comprehensive Personal Protective Equipment (PPE) policy, to help clearly identify the protection required when certain hazards are present.

The purpose of this PPE policy is to document the hazard assessment, the protective measures in place, and the PPE in use at this Company. PPE devices are not to be relied on as the only means to provide protection against hazards but are used in conjunction with guards, engineering controls, and sound manufacturing practices. If possible, hazards will be abated first through engineering controls, with PPE to provide protection against hazards that cannot reasonably be abated otherwise.

### The Company's PPE program covers the following:

- Training
- Equipment Selection
- Protective Equipment
- Cleaning and Maintenance

Specific sites and general contractors may have more/less stringent requirements than the Company. The more stringent requirements will apply at those sites.

### TRAINING

Any employee-owners required to wear PPE will receive training in the proper use and care of PPE before being allowed to perform work requiring the use of PPE. Periodic retraining will be offered to PPE users as needed.

The training will include, but not necessarily be limited to, the following subjects:

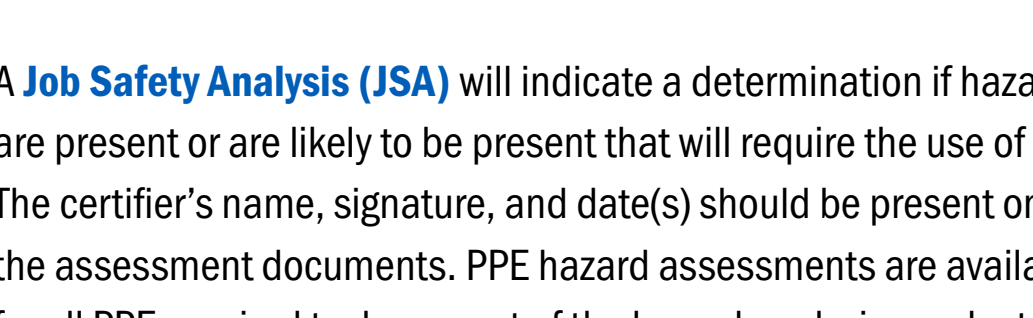
- When PPE is to be worn
- How to properly don, remove, adjust, and wear PPE
- The limitations of PPE
- The proper care, maintenance, useful life, and disposal of the PPE

Following training, employee-owners will demonstrate that they understand how to use PPE properly or they will be retrained. The training of each employee-owner will be documented.

### EQUIPMENT SELECTION

EXHIBIT 2.K.001

#### Personal Protective Equipment Requirements



When selecting personal protective equipment, the following requirements must be met:

- Manufactured in accordance with accepted standards for performance and materials from American National Standards Institute (ANSI) and National Institute for Occupational Safety and Health (NIOSH)
- Durability and, if possible, the ability to maintain the equipment on the job site
- Provide desired protection to employee-owners against hazard exposure
- Provide maximum comfort with minimal weight
- Provide minimum restriction of body movement, vision, etc.

A **Job Safety Analysis (JSA)** will indicate a determination if hazards are present or are likely to be present that will require the use of PPE. The certifier's name, signature, and date(s) should be present on the assessment documents. PPE hazard assessments are available for all PPE required tasks as part of the hazard analysis conducted before the task is started. Anyone can request a JSA. Please contact the Safety Manager for this to be completed.

A Job Safety Analysis (JSA) is a tool the Safety Department uses to ensure that employee-owners are adequately being protected from hazards. This can be done by engineering out the hazard, using PPE, or other administrative controls.

The Company has many JSA already completed on various tasks we perform daily. If you would like to have a JSA completed on a job or task you perform, please contact the Safety Manager. Below is a sample of what a JSA looks like:

EXHIBIT 2.K.002

#### Sample Job Safety Analysis Form

ESS CONSTRUCTION		
DATE:	JOB TITLE:	DEPARTMENT: AS JOB S/N
LOCATION OF JOB:	SUPERVISOR:	REVIEWED BY:
	APPROVED BY:	
List All Required Personal Protective Equipment:		
BASIC JOB STEPS	POTENTIAL ACCIDENTS OR HAZARDS	RECOMMENDED SAFE JOB PROCEDURE

### WORK CLOTHING & GENERAL PROTECTIVE MEASURES

- Loose-fitting or torn clothing is dangerous around machinery and should not be worn. If near moving parts, rings, bracelets, and loose sleeves may get caught.
- Any PPE provided should be worn and cared for properly in order that it may be maintained in good condition.
- Appropriate clothing should be worn for the work being performed.
- Hand protection, hearing protection, and respiratory protection should be worn as dictated by hazard and operation.

### HEAD PROTECTION

- All hard hats must meet ANSI standard ISEA Z89.1-2009.
- Hard hats are to be worn on all Company projects. Hard hats should never be worn on top of everyday hats or caps, as this may interfere with the design protection of the hard hat.
- Adjustment of the sweatband should be snug enough so that the hard hat stays on when the wearer leans over, looks up, or during a strong gust of wind. The hard hat should not be worn so tight that it leaves a band mark on the forehead.
- Never attempt to repair a damaged or cracked hard hat shell. Damaged hats are to be replaced immediately.
- Drilling holes in the hat for any reason destroys the rated strength and is prohibited. Painting of the hat is prohibited. Stickers are allowed.
- Hard hats should be worn with the bill (visor) to the front (over the nose). The bill keeps many chips, dust, and dirt particles from going over the safety glasses and into the eyes. Exceptions will be allowed for welders and survey crew personnel while looking through surveying instruments, while heads are in tight spaces, and when the hard hat bill would interfere with mobility.

### HAND PROTECTION

Employee-owners must use appropriate hand protection (i.e., gloves) when their hands are exposed to hazards such as those from skin absorption of harmful substances, severe cuts or lacerations, severe abrasions, punctures, chemical burns, thermal burns, and harmful temperatures.

OSHA requires employers to provide hand protection when they are exposed to hazards. Level 3 cut protection gloves must be worn when you are doing the following tasks:

- Material handling (loading concrete forms, pipes, tools, using a shovel, etc.)
- Using hand/power tools
- Drilling
- Loading/unload materials/trucks
- Any areas of pinch points or where a hand can get crushed

We know this policy can't include every task, so here is a list of jobs that don't require gloves:

- Surveying
- Walking the jobsite
  - + Project manager's safety inspections
  - + Estimators
  - + Supervisors
- Operating equipment
- During jobsite meetings/inside trailers
- While completing paperwork or using electronic devices to complete job tasks
- Tasks that require manual dexterity that cannot be accomplished with gloves
- Concrete finishing should not be done with webbed gloves
  - + See Safety Manager for alternative gloves.

The purpose of this policy is to explain that when sharp objects, heat, chemicals, or any type of material can cause harm to the hand/fingers, employee-owners should wear gloves. Contact your Safety Manager if you have questions about tasks requiring level 3 cut protection gloves.

### FOOT PROTECTION

- Employee-owners who work in the field are required to wear work boots or shoes with soles that are resistant to penetration and feature upper parts that offer ankle protection.
- Employee-owners who work in areas in which items can be dropped on the foot are required to wear safety-toed boots meeting ANSI standard Z41.
- Metatarsal guards are required to be worn during any activity that could result in serious injury to the top of the foot, such as jackhammering, using a jumping jack, etc.



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### EYE & FACE PROTECTION

- Safety glass/goggle eyewear shall be worn at all times where physical, chemical or radiation injuries can occur to the eyes. This includes all construction sites, equipment shop areas, and all workers that are servicing equipment and machines.
- All commercial quality face shields and safety eyewear will meet the ANSI standard Z87.1.
- Employee-owners shall receive non-prescription protective eyewear during orientation and can request additional pairs from a supervisor.
- Employee-owners who wear prescription glasses must:
  - + Wear glasses that provide for equal vision correction and meet the ANSI standard Z87.1 requirement for safety glasses,
  - + Wear protective goggles/glasses over their prescription glasses,
  - + Or wear goggles with corrective lenses incorporated into the goggles.
- Face shields are required to be worn during any activity that could result in serious injury to the face, such as using a cut-off saw, grinding, etc.

### SAFETY HARNESES, LANYARDS & LIFELINES

- Fall protection, as required by OSHA/MSHA and this PPE policy, shall be provided for employee-owners.
- Each employee-owner shall be made aware of the Company's policy to wear safety harnesses when the location and work dictates. This policy is to be strictly enforced. Any employee-owner found not using fall protection as required will face disciplinary action up to and including suspension or termination.
- Lifelines shall be secured to a point above operations capable of withstanding a minimum of 5,000 pounds dead weight or two times (2x) the intended load.
- Safety harnesses, lanyards, lifelines, and associated hardware shall be inspected after each use for wear and possible damage. If equipment is subject to in-service loading (an actual fall situation), it is to be removed immediately from service. Periodic inspections of all harnesses, lanyards, lifelines, and associated equipment that have been kept in storage shall be completed to reveal any damage or deterioration that may have occurred.

### SAFETY VESTS

A minimum of ANSI Class II safety clothing/vests will be worn by all employee-owners in the field while working on any construction site and/or around any equipment or motor vehicle traffic, either on the project site or in a public motor vehicle traffic right-of-way. Employee-owners working at night are required to wear garments meeting ANSI Class III requirements, including reflective leggings. Vests will be provided at the time of employment and will meet ANSI Class II requirements for reflectivity.

IT'S A DIRTY JOB

IN THE EVENT A VEST IS FADED, DIRTY, OR IS NO LONGER EFFECTIVE, IT SHOULD BE REPLACED IMMEDIATELY.

GREASE, ASPHALT, AND OTHER FLUIDS CAN REDUCE THE INTENSITY OF THE RETROREFLECTIVE MATERIALS.

### WORKING OVER OR NEAR WATER

- Employee-owners working over or near water, where the danger of drowning exists, will be provided with a U.S. Coast Guard life jacket or buoyant work vest unless utilizing continuous fall protection.
- If working off of boats or barges, lifejackets are required.
- Vests shall be inspected for defects before and after each use.
- Ring buoys with 90 feet of rope shall be available for use in an emergency.
- An emergency skiff or boat shall be immediately available in areas where depth of water allows the use of a boat.

THIS MAY SOUND LIKE YOUR MOTHER

**BUT IT IS IMPORTANT!**

### CLEANING AND MAINTENANCE

It is important that all PPE be kept clean and properly maintained by the employee-owner to whom it is assigned. Cleaning is particularly important for eye and face protection, where dirty or fogged lenses could impair vision.

- PPE is to be inspected, cleaned, and maintained by employee-owners at regular intervals as part of their normal job duties so that the PPE provides the requisite protection.
- Supervisors are responsible for ensuring that employee-owners are compliant with cleaning requirements.
- If PPE is for general use, the employee-owner is responsible for cleaning and maintenance.
- If a piece of PPE is in need of repair or replacement, it is the responsibility of the employee-owner to bring it to the immediate attention of his or her supervisor or the Director of Environmental Health and Safety.
- It is against work rules to use PPE that is in disrepair or not able to perform its intended function. Contaminated PPE that cannot be decontaminated must be disposed of in a manner that protects employee-owners from exposure to hazards.



EMPLOYEE-OWNERS ARE TO FOLLOW MANUFACTURER'S RECOMMENDATIONS FOR USE OF ALL PPE.