

SAFETY RESPONSIBILITIES AND ACCOUNTABILITY

WITH GREAT POWER COMES GREAT RESPONSIBILITY.

Everyone associated with a Company project, operation, or activity must understand his or her responsibilities concerning health and safety. With the responsibilities defined, management, supervision, subcontractors, and workers will be held accountable for their health and safety performance.

GENERAL SAFETY RESPONSIBILITIES

- Employee-owners, subcontractors, suppliers, and vendors will comply with all applicable government laws, rules, specific client policies and regulations, and company safety policies. If any of these standards, requirements, rules, procedures, or initiatives conflict, the most stringent one will prevail.
- All employee-owners, especially managers, superintendents, foremen, and safety managers, will be expected to monitor safe practices. When one of these individuals sees an employee-owner committing an unsafe act, he or she will be expected to immediately correct the situation. In addition to the training requirements of the project, training will be conducted on an as-needed basis, such as personal or site training. If there is a question as to whether or not a condition is safe, contact the superintendent and/or Safety Department for guidance.

USE YOUR JUDGMENT

NO EMPLOYEE-OWNER IS EVER REQUIRED TO PERFORM WORK THAT THEY BELIEVE IS UNSAFE, OR LIKELY TO CAUSE INJURY OR A HEALTH RISK TO THEMSELVES OR OTHERS.

CORPORATE MANAGEMENT RESPONSIBILITIES

- Provide direction for the development of the Safety Management Program.
- Monitor organizational safety metrics and make adjustments to operations as needed.
- Ensure all managers and supervisors understand their roles and responsibilities.
- Hold individuals and the organization accountable for the implementation of the Company's Safety Management Program and objectives.

DIRECTOR OF ENVIRONMENTAL HEALTH AND SAFETY RESPONSIBILITIES

- Act as direct supervisor for Environmental Health and Safety staff.
- Provide coordinated management of Safety Managers. Share responsibility with vice presidents and department directors.
- Mentor Environmental Health and Safety staff throughout the Company.
- Ensure that Environmental Health and Safety staff have training and development to support operations.
- Monitor the work quality of Environmental Health and Safety staff. Review and approve reports and other documents as needed for direct reports. Audits, incident investigations, expense reports, and other required paperwork need accountability.
- Support the project operation management teams to ensure all environmental permits are handled with proper priorities for all operations with an environmental manager.
- Ensure that clerical staff maintain the OSHA safety log, incident reports, data analytics on key performance indicators, and other administrative requirements related to safety operations and regulations.
- Coordinate with the legal department on property and casualty claims as needed.
- Manage Workers Compensation and employee-owner related claims and coordinate with the human resources department as needed.
- Responsible for the compliance, certification, and training related to our nuclear gauges and other radioactive sources, ensuring the Company meets the training requirements of the Nuclear Regulatory Commission (NCR).
- Provide effective OSHA standards training as a minimum for the employee-owners.

ENVIRONMENTAL HEALTH AND SAFETY MANAGER RESPONSIBILITIES

The Safety Department and subcontractor safety personnel will generally oversee the application of the Safety Management Program. Both will perform the following:

- Inspect the projects to which they are assigned and ensure compliance with the Company's Safety Management Program including all other related regulations and requirements. They will assist the superintendents, conduct safety audits and industrial hygiene surveys as needed, and look for ways to help improve the quality of safety by working with project managers, superintendents, owners, insurance companies, and others as required.
- Stop any construction activity which constitutes an immediate threat of imminent danger until such conditions have been corrected.
- Conduct follow-up inspections on accidents.
- Ensure safety meetings are conducted/documented.
- Support job site pre-mobilization meetings when needed to review the safety requirements of each subcontractor associated with the project.
- Work with the owner in providing an injury free workplace through site-specific regulation enforcement.
- Assist management and subcontractors in providing the necessary training to accomplish the goals of the project.
- Make certain that each project has all required posters, signs, and other safety-related materials to assist in keeping the project safe.
- Work closely with all insurance groups to make certain that the company is in compliance with the requirements of their policies.
- Manage the accident by keeping track of injury status and employee-owner well-being until the employee-owner returns to work.
- Meet regularly with project management to review activities in progress and to discuss ways the company can improve its Safety Management Program as well as current performance.
- Furnish each project with current publications of the Safety Management Program, the OSHA Standards for the construction industry, and all state and local requirements.

PROJECT AND OPERATIONAL MANAGEMENT RESPONSIBILITIES

- Eliminate potential hazards from our projects and work areas. If the hazard cannot be removed, ensure appropriate safeguards, personal protective equipment, and safe work tasks are in place.
- Provide necessary personal protective equipment (PPE) and enforce its use and care.
- Become familiar and comply with applicable OSHA standards (29 CFR 1910, General Industry, and 1926, Construction) and make copies of medical records as well as all safety and health programs available for employee-owners to review.
- Review, consider for approval, and execute appropriate action on safety policies developed by the Environmental Health and Safety Director or staff.
- Ensure a high level of productivity and safety performance and hold project management staff accountable.
- Assign an individual(s) [competent person] the authority for the implementation of the Safety Management Program at each worksite.
- Ensure all environmental permits are handled with proper priorities for all operations with an environmental manager and that the permit meets obligations of the project contract.
- Account for concrete and asphalt plant permits, fuel storage, quarry, and environmental management items.

SUPERVISOR RESPONSIBILITIES

- Know safety rules and work practices that apply to the work you supervise.
- Take action to confirm that all employee-owners in your charge understand the safety rules that apply to them.
- Always take immediate action to correct safety rule violations. Unsafe acts or procedures cannot be tolerated.
- Identify hazards and confirm that hazard analysis has been performed.
- Prevent bad work habits from developing. You are responsible to make daily observations of employee-owners to ensure that they perform their work safely and continue this observation regularly once safe working habits are established.
- Take action to anticipate, correct, or control hazardous conditions within your work areas. If it is beyond your control, remove the employee-owner(s) until the condition is safe. Eliminate unsafe conditions and prevent an accident.
- Expect employee-owners to report unsafe conditions or procedures. Listen to your employee-owners and don't take their safety complaints lightly. No job should proceed when a question of safety remains unanswered. Seek advice from your project manager when necessary.
- Set a good example. Demonstrate safety in your own work habits and personal conduct. Always wear personal protective equipment in areas where personal protective equipment is required.
- Train employee-owners including subcontractors under your supervision on the proper safety procedures to follow, including the use of additional safeguards such as machine guards and personal protective equipment.
- Investigate and analyze every accident, however slight, that occurs to any of your employee-owners. Control the causes of minor incidents to help avoid future crippling accidents.
- Support the safety manager in the incident injury status by maintaining communication with injured employee-owners and being a liaison between the safety manager and employee-owners.
- Complete and file a report on each and every incident and accident that occurs at your jobsite. If you have questions or require reporting forms, contact your project manager.
- Conduct safety toolbox meetings.
- Make safety suggestions.
- Take an active part and participate in safety meetings.

EMPLOYEE-OWNER SAFETY RESPONSIBILITIES

- The primary responsibility of all employee-owners is to perform their duties in a safe manner in order to prevent injury to themselves and others.
- As a condition of employment, employee-owners must become familiar with, observe, and obey rules and established policies for health, safety, and preventing injuries while at work.
- Employee-owners must learn the approved safe practices and procedures that apply to their work.
- Before beginning special work or new assignments, an employee-owner should review applicable and appropriate safety rules provided by the Company.
- If an employee-owner has any questions about how a task should be done safely, then stop immediately. In this event, the employee-owner is instructed not to begin the task until they discuss the situation with their supervisor. Together, they will determine the safe way to do the job.
- If, after discussing a safety situation with their supervisor, an employee-owner still has questions or concerns, they should contact a Safety Manager.

ADDITIONAL EMPLOYEE-OWNER RESPONSIBILITIES

- Horseplay, 'practical jokes,' etc., are forbidden. Conduct that places the employee-owner or others at risk, or which threatens or intimidates others, is forbidden.
- Employee-owners are responsible for keeping their work area clean and safe. This includes keeping equipment cabs clean and free of trash and debris, and maintaining tool trailers in a neat and orderly fashion.
- All work-related injuries must be reported to the supervisor immediately. Failure to immediately report injuries can result in loss of Workers' Compensation benefits. After each medical appointment resulting from a work-related injury, contact your supervisor to discuss your progress. Provide supervisor any paperwork received at the appointment.
- Transitional Return to Work (light duty) jobs for persons injured at work. Transitional work is meant to allow the injured or ill employee-owner to heal under a doctor's care while she/he remains productive. Employee-owners are required to return to work immediately upon release.