



UP G, LLC
SITE SAFETY AND INCIDENT
PREVENTION MANUAL

Revision Date: 01-01-2026

TABLE OF CONTENTS

HEALTH AND SAFETY POLICY.....	4
SITE SAFETY & INCIDENT PREVENTION	5
CONTRACTOR SAFETY PERFORMANCE	5
DESIGNATED CONTRACTOR COMPETENT PERSON	6
SAFETY REGULATIONS	7
CONTRACTOR SAFETY SUBMITTALS.....	8
Violation of Safety and Health Requirements.....	8
DISCIPLINARY PROGRAM.....	9
Safety Violations.....	10
SUBSTANCE ABUSE PROGRAM.....	10
WORK-RELATED INJURIES, ILLNESSES AND INCIDENT INVESTIGATION	11
SAFETY PLANNING.....	11
SAFETY INSPECTIONS.....	11
Daily Trench Inspections	12
Daily Equipment Inspections.....	12
Hand and Power Tool Inspections.....	12
SAFETY TRAINING.....	12
Safety Orientation.....	12
Lone Worker.....	12
Weekly Tool Box Safety Meetings.....	13
GENERAL SAFE WORK PRACTICES.....	13
PROJECT SAFETY RULES	13
EMERGENCY ACTION PROCEDURES.....	14
FIRST AID POLICY.....	14

HEAT STRESS	14
Heat Disorders and Health Effects	15
Heat Exhaustion	15
Heat Cramps.....	16
HAZARDOUS COMMUNICATION/SDS	16
List of Hazardous Materials	16
Safety Data Sheets (SDS's)	16
Labels and Other Forms of Warning	17
Training	17
Contractor Employees.....	18
Community Right to Know	18
PROCESS SAFETY MANAGEMENT/CONTRACTOR REQUIREMENTS	18
PERSONAL PROTECTIVE EQUIPMENT.....	18
Head Protection	18
Eye and Face Protection.....	18
Foot Protection	19
Work Attire.....	19
Hearing Protection	19
Hand Protection	19
HAND AND POWER TOOLS.....	19
Hand Tools	19
Electric Tools	20
Portable Abrasive Wheel Tools	20
Pneumatic Tools.....	20
HOUSEKEEPING AND ORDERLINESS.....	20
UP G, LLC Cleanliness Standard.....	20
General Housekeeping Requirements.....	20
TRENCHING & EXCAVATION SAFETY.....	21
UNDERGROUND UTILITY LOCATIONS	22
EQUIPMENT AND VEHICLES	22
ERGONOMICS	23

WILDLIFE AWARENESS.....	23
ENVIRONMENTAL POLICY	24
SCHOOL SAFETY PLAN.....	25
CODE OF CONDUCT/WORKPLACE VIOLENCE.....	25
MOTOR VEHICLE OPERATIONS.....	25

HEALTH AND SAFETY POLICY

Management, staff, hourly employees, and subcontractors of **UP G, LLC** must have a common objective to be successful. Our objective is the healthy, safe, environmentally sound, and productive operation of all **UP G, LLC** activities on this project site. We have an obligation to preserve the human, physical, and financial resources of our company. In satisfying this obligation, worker safety and health will always be our #1 priority. As such, this safety policy must be considered in every phase of our business including acquisition, job planning, job setup, and performance. Accordingly, our principal objectives are to:

- Provide a work environment that is free of unmitigated recognized hazards.
- Comply with all laws that regulate employee safety, health and our environment.
- Recognize the priority of safety and health factors over purely economic considerations.
- Hold each employee accountable for the safe execution of all jobs assigned and full compliance with all environmental, safety, and health related procedures and training.
- Train our employees in safe and proper job procedures and required compliance with established procedures, policies and practices.
- Provide comprehensive New Employee Safety Training to all new hires.
- Hire only those persons who demonstrate the capacity to comprehend and execute all jobs in a safe and healthful manner consistent with the policies and procedures of the company and the training and jobs instruction provided.
- Promote worker health and safety both on and off the job.
- Maintain leadership in safety and accident/incident prevention by continuously improving safety performance and work methods/procedures.

First-line supervision has the greatest impact and thus the greatest opportunity to influence and promote safe work practices among our work force in the field. **The prevention of accidents/incidents requires everyone's concerted effort and daily attention. Everyone has equal authority and responsibility to take appropriate action to correct unsafe acts/or conditions.** The project **Superintendent/Foreman** has the overall responsibility for safety at this project location. **Owner and/or Superintendent** has the corporate responsibility and authority for safety and accident prevention.

As a condition of doing business with UP G, LLC, all subcontractor employees and tiered subcontractors engaged on this project are required to adhere to our project safety rules, regulations and policies established by our Safety Program. In addition to our own safety requirements, our Safety Program incorporates regulations of the current editions of the State and Federal laws, including but not limited to, the latest amendments of the following: Williams-Steigler Occupational Safety and Health Act of 1970, Public Law 91-956; Part 1910, Occupational Safety & Health Standards, Chapter 17 of Title 29, Code of Federal Regulations; Part 1926, Safety & Health regulations for Construction

Chapter 17 of Title 29, Code or Federal Regulations. This site specific safety and incident prevention program will assist project management, supervision, subcontractors, and tiered subcontractors and workers in understanding an incident free environment and the safety and health expectations and requirements of this project. This project has been designated an **Injury Free Construction Site**.

A properly planned and executed project will eliminate the potential for losses and return benefits that satisfy needs in each of these areas:

- Health, Safety, & Environment
- Cost
- Quality
- Morale
- Production
- Customer Satisfaction

All employees will contribute to the company environmental, health, and safety program by following all policies and procedures, bringing unsafe conditions/acts to the attention of management, and recommending actions to improve the effectiveness of the program. Supervisors shall insist that project personnel observe and obey the rules and regulations necessary for the safe conduct of work, and shall take such action necessary to obtain compliance.

Management will be responsible for promoting a healthy culture throughout the organization, set a high standard for safety and health practices, and lead by example. Management will meet bi-annually to evaluate policy and procedures and to ensure the needed financial, material and personnel resources are provided to achieve the goals and objectives of the safety and health program.

SITE SAFETY & INCIDENT PREVENTION

This Site Safety and Incident Prevention of each project is prepared to assist project management, supervision, contractors and workers in understanding the incident injury free philosophy and the health and safety expectations and requirements of UP G, LLC on the projects. **Compliance with this Site Safety and Incident Prevention is expected and a condition of employment on this project.**

Contractors' project managers and superintendents have overall responsibility for the implementation and the execution of this Site Safety and Incident Prevention.

CONTRACTOR SAFETY PERFORMANCE

UP G, LLC expects all contractors to execute his or her work on this project with a visible, proactive, and commitment to safety at all levels. Each contractor should plan their work with focus on protecting their workers from incidents and injuries. The following are actions that each of us can take to improve safety performance on this project:

- Attend and actively participate in all safety meetings.
- Discuss safety in all meeting.

- When you talk about safety, talk about people, not numbers or statistics.
- Ask where the next injury is likely to happen and what can be done to prevent it.
- Recognize individuals and groups daily for working safely.
- Take positive actions when you see someone doing something you believe is unsafe. Talk to them about your concern for their safety, not about violating rules or procedures.
- Take responsibility for people's safety that work with you, for you and around you.
- Find ways to express care and concern for people and work to improve the dignity and respect people experience on the project.
- Make and keep promises around safety issues.

Immediate corrective action will be taken to eliminate any safety discrepancy, hazard, at-risk behavior, or violation observed.

DESIGNATED CONTRACTOR COMPETENT PERSON

Each contractor will designate a competent person as defined by OSHA 29 CFR 1926.32(f) as "one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who as authorization to take prompt corrective measures to eliminate them" as their project safety representative. This person(s) name will be submitted to UP G, LLC and this person must have the authority and responsibility to ensure the proper implementation and enforcement of this Site Safety and Incident Prevention Program.

The General Trades Competent Person/Foreman designated will be expected to have an adequate knowledge of OSHA construction and general industry standards. The designated representative will, as a minimum:

- Attend OSHA 10 hour construction safety training, although OSHA 30 hour construction safety training is highly recommended.
- Conduct regular safety meetings with workers to instruct them on project safe work practices and requirements.
- Submit safety information in a timely manner.
- Conduct pre-task safety plans and communicate daily to workers to ensure compliance with safe work practices, this Site Safety and Prevention Program and OSHA safety regulations.

The Trenching and Excavation Competent Person designated to oversee digging trenches and excavations will be expected to have an above average knowledge of OSHA 29 CFR 1926.650 Subpart P – Excavations. The designated representative will as a minimum:

- Attend OSHA 10 hour construction safety training, although OSHA 30 hour construction safety training is highly recommended.
- Conduct daily inspections of trenches and excavations and instruct workers in safe work practices.
- Submit safety information in a timely manner.
- Conduct pre-task safety plans and communicate daily to workers to ensure compliance with safe

work practices, this Site Safety and Prevention Program and OSHA safety regulations.

The Fall Protection Competent Person designated to oversee his company's fall protection plan will be expected to have an above average knowledge of OSHA 29 CFR 1926.500 Subpart M – Fall Protection. The designated representative will as a minimum:

- Attend OSHA 10 Hour Construction safety training, although OSHA 30 hour construction safety training is highly recommended.
- Conduct daily inspections of fall protection equipment, instruct workers in proper personal fall protection methods, inspect guardrails systems and other fall protection systems used to protect workers within your scope of work.
- Submit safety information in a timely manner.
- Conduct pre-task safety plans and communicate daily to workers to ensure compliance with safe work practices, this Site Safety and Prevention Program and OSHA safety regulations.

The Safety Competent Person designated to oversee the safety of their employees and subcontractors will be expected to have an above average knowledge of OSHA construction and general industry standards.

- Attend OSHA 10 Hour Construction safety training, although OSHA 30 hour construction safety training is highly recommended.
- Have as a minimum 5 years' experience in the commercial construction.
- Conduct daily inspections of the work areas, conduct regular safety meetings with workers to instruct them on project safe work practices and requirements.
- Submit safety information in a timely manner. Conduct accident and near miss investigations reports and lessons learned.
- Conduct pre-task safety plans and communicate daily to workers their work activities to ensure compliance with safe work practices, this Site Safety and Prevention Program and OSHA safety regulations.

SAFETY REGULATIONS

UP G, LLC and contractors/subcontractors and employees will incorporate, as a minimum, OSHA 29 CFR 1926 Construction Safety Standards, OSHA 29 CFR 1910 General Industry Standards (as applicable), specific state safety regulations, specific owner requirements, project safety rules, and this Site Safety and Incident Prevention Program when determining the safe work practices and protection of all workers. If any of these standards, requirements, or procedures conflict, the more stringent requirement shall prevail.

CONTRACTOR SAFETY SUBMITTALS

Prior to beginning work each contractor shall submit to UP G LLC's Superintendent or his representative the following as may be required:

- Contractor's written site specific safety programs
- Contractor's written housekeeping plan
- Contractor's written hazardous communication program.
- Contractor's written substance abuse program.
- Material Safety Data Sheets (MSDS/SDS) for all chemicals and materials used or stored on site.
- Names of designated competent persons as required by their scope of work for trenching, plowing, drilling etc.
- Names of trained and qualified equipment operators as required by their scope of work for Cable Plows, Excavators, Drills/Bores etc.
- Names of employees trained in First Aid.
- Detailed job hazard analysis/Pre-Task Safety Plan for the scope of work
- Personal Protective Equipment Hazard Assessment and Certification
- Verification of OSHA and/or project required training as may be necessary. Examples of training may include:
 - OSHA 10 hour construction safety training
 - Trenching
 - Avoid Underground Utilities
 - Horizontal Directional Drilling Best Practices
 - General construction hazards

Throughout the course of the project each contractor may be required to submit various on-going safety documents to UP G, LLC's Superintendent as required by the scope of work. These submittals may include, but not limited to:

- Monthly Incident Summary Report.
- Accident and incident investigation report (within 48 hours).
- Daily Work Site Safety Inspections.
- Daily documented trench, plow, drilling inspections.
- Weekly safety tool box meeting training records.
- Daily pre-task safety plan
- Daily inspections of heavy equipment (excavators, plows, drills and etc.)
- Inspections of hand and power tools.
- Daily inspections of material handling

Violation of Safety and Health Requirements

Violations of statutory health and safety regulations or the project safety rules and policies contained in the site safety plan will not be tolerated. All hazards identified are to be abated immediately. When a hazard cannot be immediately corrected, a written explanation is to be submitted to UP G, LLC's

Construction Superintendent. Failure to correct hazards may result in disciplinary actions or suspension of part or all work.

ANY PERSON HAS THE AUTHORITY TO STOP WORK DUE TO POTENTIAL HEALTH AND SAFETY ISSUES.

DISCIPLINARY PROGRAM

At-risk behavior on this project that contributes to an incident or injury will not be tolerated. Each worker has an individual responsibility to work safely and minimize unsafe actions. UP G, LLC reserves the right to discipline/fine a contractor based on safety violations committed by their Employees, this including direct hire UP G, LLC employees can be fined and/or terminated. The fines will not be based solely on an individual employee's safety violations but on the company's safety violations, should it be a contractor or subcontractor.

UP G, LLC has established a progressive disciplinary program for those acts or practices not considered Immediately Dangerous to Life or Health.

Committing an unsafe act and or practice that is not Immediately Dangerous to Life or Health will result in the following:

- First occurrence: Verbal warning
- Second occurrence: Written warning, re-training, or sanctions to include but not limited to suspension from project, holding monthly invoice checks and/or paychecks etc. and meeting with contractor's management personnel or UP G, LLC employee directly.
- Third occurrence: Written notification of sanctions, possible termination from project site. At the time of the third violation, UP G, LLC will also impose our extended disciplinary program which entails a fine structure for any UP G, LLC employee and/or contractor whose employees commit repeated "other-than- serious" unsafe acts.

Other-than-serious safety violations may consist of, but not limited to:

- Failure to wear hard hat properly
- Failure to wear safety glasses/eye protection when required.
- Failure to use hearing protection when required.
- Failure to wear proper work boots/shoes and clothing.
- Failure to wear seatbelts on mechanized equipment.
- Failure to have first aid kit.

Committing unsafe acts and or practices that are considered Immediately Dangerous to Life and Health (IDLH) may result in immediate termination from the project. UP G, LLC also reserves the right to immediately sanction an UP G, LLC employee and/or contractor.

Sanctions include immediate abatement of the IDLH condition/hazard and issuance of fines to the UP G, LLC employee and/or contractor. Based on the severity of the hazard the Safety Director and project

Superintendent/Project Manager will determine the amount of the fines. UP G, LLC reserves the right to terminate an UP G, LLC employee and/or contractor for repeated IDLH safety violations.

IDLH safety violations may include, but are not limited to:

- Working in an unprotected trench greater than 5 feet deep.
- Failure to follow the Substance Abuse Policy will result in a fine and removal from the job.
- Failure to wear reflective vest (bright color) when required.
- Possession of firearms, explosives or dangerous weapons.
- Violation of project security rules and procedures.
- Fighting, horseplay, practical joking or gambling.
- Mishandling of and/or Operating equipment negligently.

It is impossible to publish every safety rule to cover every circumstance. However, if workers fail to follow safe work practices not covered by this policy, disciplinary action and or fine will be assessed based on UP G, LLC's on site Superintendent and Project Manager's assessment of the violation.

Safety Violations

Non-serious safety hazards can carry fines ranging from \$50.00 to \$500.00 per occurrence per person based on Superintendent and Project Manager's discretion.

Serious safety hazards can carry fines ranging from \$1000.00 and up per occurrence per person including permanent removal of employee (s) from the project based on Superintendent and Project Manager's discretion.

Harassment is defined as any behavior that disturbs or upsets another employee, and that is typically repetitive. Harassment will not be tolerated and should be reported immediately to supervisor and/or management.

SUBSTANCE ABUSE POLICY

This project is committed to providing a safe, drug free work place for all employees. This policy applies to all UP G, LLC's employees, contractors, subcontractors, vendors, and other third party employees.

Drug and alcohol abuse on and off the job can contribute both to incidents and to greater risk for all individuals employed on this project, as well as the general public. Construction work is dangerous; therefore all work tasks on this project will be considered safety sensitive. The use, sale, offer to sell, purchase, and transfer, distribution, or possession of drug paraphernalia, any detectable amounts of alcohol or illegal drug, firearm, or other dangerous weapons by any employee on this project is prohibited. Each UP G, LLC foreman, contractor and subcontractor will promote a Drug Free Workplace with their employees and communicate during the safety orientation what constitutes prohibited activities. Every worker involved in an incident shall have a post incident drug/alcohol test

performed within six (6) hours after the incident. Any worker on the project site who is reasonably suspected of being under the influence of alcohol or a controlled substance shall be tested. UP G, LLC Foreman's, Contractors and Subcontractors will transport their workers involved in an incident to a collection facility selected by UP G, LLC. Workers that refuse to test, stall to be tested, are uncooperative with collectors, or attempt to alter a urine specimen will be considered positive and immediately removed from the project.

WORK-RELATED INJURIES, ILLNESSES AND INCIDENT INVESTIGATION

An incident is defined as any unplanned or undesired event that results in a work-related injury/illness, property damage, or disruption of business where the cause was from human errors or omission.

Every incident will be investigated to determine the probable root causes (s) and steps required to prevent a similar occurrence from happening in the future.

In the event of a work-related injury or illness, the worker is to notify his or her supervisor. All work related injuries/illnesses and incidents must be reported to UP G, LLC immediately.

First line supervision will be responsible for conducting the investigation of the incident immediately. A safety representative may assist the first-line supervisor in the investigation but will not solely conduct the investigation. The incident notification and investigation report form will be submitted to UP G, LLC within 48 hours of the occurrence.

SAFETY PLANNING

Job Hazard Analysis (Completed by Contractor Superintendent and Project Manager)

As may be required, prior to starting work on this project, each Foreman, contractor or subcontractor will submit a written Job Hazard Analysis for their scope of work. The Job Hazard Analysis must identify and outline each work component or activity, list the potential safety and health hazards associated with each activity, and describe what safety controls, PPE, tools and equipment will be implemented and required to mitigate the recognized hazards in order to safely complete each activity.

Pre-Task Safety Planning (Completed by Contractor Foreman or First Line Supervisor)

As may be required, each Foreman or designated supervisor will analyze each task to be performed for each scope of work and identify the work sequences, hazards, and controls necessary to protect workers from the identified hazards. The Pre-Task Safety Plan will be communicated daily to each crew performing work on this project.

SAFETY INSPECTIONS

Each UP G LLC Foreman, Contractor and Subcontractor performing work will be responsible for conducting daily safety inspections of their work area, tools and equipment. The following inspections may be required as applicable to ongoing work activities.

Daily Trench Inspections

Each UP G, LLC foreman, contractor and subcontractor working in trenches or excavations will designate a competent person to inspect all excavations each day prior to beginning work.

Daily Equipment Inspections

Each UP G, LLC foreman, contractor and subcontractor using equipment on this site will designate a competent person to inspect each crane each day prior to use.

Hand and Power Tool Inspections

All contractors using hand and power tools shall inspect them daily prior to each use.

SAFETY TRAINING

Safety and health training is a requirement and mandatory for all employees, contractor and subcontractor workers assigned to this project to promote and ensure that an incident and injury free environment exists.

Safety Orientation:

All project management, supervisors, and workers shall attend site-specific safety orientation training as may be required. UP G, LLC's Superintendent or his representative will conduct safety orientations. No workers will be allowed to start work until they have attended the safety orientation.

As a minimum, the safety orientation will include the Project Safety Rules, emergency action plans, fire extinguisher training, safety training requirements and procedures contained in this manual. The site-specific orientation will communicate each worker's responsibility to be in compliance with this project's Site Safety and Incident Prevention Program, Project Safety Rules, regulations, accountability, and the disciplinary policy.

Lone Worker

With the exception of the operation of motor vehicles, no worker employed less than 30 days (short service team member) will be allowed to work alone. If a team member has met the 30 day requirement, they may work alone but they must be aware of the dangers of doing so. These dangers and hazards differ from job site to job site and include but are not limited to accidents associated with fatigue, issues with personal disease or sickness, unexpected third party actions, extreme weather conditions, etc. If a qualified team member is working alone he is to check in at least once every four hours with his supervisor.

A short service team member (employed less than 30 days) must work under direct supervision. The project supervisor is the short service team member's mentor and will assist them with their

development. Owner clients must be notified of short service team members who will be working at their project site. Any owner requirement to work in terms will be adhered to.

Weekly Tool Box Safety Meetings

All workers assigned to this project will participate in weekly Tool Box Safety Meetings conducted by UP G, LLC. Documentation of completed tool box meetings will be submitted to UP G, LLC's Superintendent. Failure to attend and/or conduct weekly meetings could result disciplinary actions.

GENERAL SAFE WORK PRACTICES

Clean and safe working conditions are absolutely essential for achieving an Incident and Injury Free Environment, as well as for the promotion of construction efficiency and progress. Each worker on this project is valued not only for what they do, but for who they are. Everyone must maintain a strong personal desire to think and act safely, in an effort to create an Incident and Injury Free Environment. The following general safe work rules are a partial list of the general rules that apply to each worker on this project. There will be no tolerance for any worker who carelessly disregards these rules or other applicable health and safety rules.

PROJECT SAFETY RULES

1. Access to this site is restricted to employees and those authorized by UP G, LLC.
2. Use and/ or possession of intoxicants, alcohol, or drugs are strictly prohibited.
3. All personnel on the project site will wear hard hats, safety glasses, reflective vests or high visibility clothing in the designated work zone as may be required.
4. Possession of firearms or other weapons is prohibited on project sites and in and on company owned property.
5. Workers will carry ear protection on their person as may be required.
6. Workers shall wear long pants and shirts with 4" minimum sleeves at all times.
7. Workers shall wear hard soled work boots. No athletic or canvas shoes.
8. No radios, tape decks or earphones allowed on site.
9. Only authorized and trained personnel are permitted to operate equipment.
10. No riders on mechanized equipment.
11. All mechanized equipment must have seat belts, operable horns and backup alarms.
12. No one shall enter a trench or excavation unless it is properly protected or sloped and employees trained on the hazards involved in trenching operations.
13. Only trained, qualified operators will use powder-actuated tools.
14. Contractors shall have a first aid kit and fire extinguisher located at their work area.
15. Report all accidents, unsafe conditions or practices to your supervisor and superintendent.
16. Contractors will provide fresh drinking water daily for their employees' use.

EMERGENCY ACTION PROCEDURES

An emergency plan is a set of rules or procedures to be followed by all personnel in the event of a project emergency. If applicable, a site specific emergency action plan will be written and all subcontractor competent persons will be notified of the location of the site specific emergency action plan when they mobilize on site. The plan and procedures will be discussed during the project safety orientation meeting.

The emergency plan is maintained in the UP G, LLC office and is under the direction of the project superintendent. The emergency plan determines the proper access/egress of emergency equipment and/or personnel into or out of the site in case of emergency.

Project superintendent will activate emergency action plan by the use of a 5 second air horn blast and/or phone communication to subcontractor competent persons.

Supervisors will be directed to key locations on the site to assist in an emergency situation.

Each employee is expected to follow direction of supervisors and cooperate in any emergency action effort. Personnel should evacuate the site in an orderly fashion if instructed to do so by supervisors. If you become aware of an emergency situation or an injury, notify a supervisor immediately.

Personnel are strictly forbidden to discuss project conditions, incidents or emergencies with the media, press or any person not associated with the project.

FIRST AID POLICY

In the event an employee is injured on the job, First Aid kits are available for the employee to treat their own injuries. First aid kits will be located in the vicinity of the work area and contents of the kit inspected when brought on site. Subcontractor Foreman will notify project superintendent or his representative if employees use first aid items. In the event of a serious injury, 911 will be called.

No employee is required to treat another's wounds. However, in the event "Good Samaritan" assistance is rendered the exposed employee and victim may be evaluated by a medical clinic or doctor for Blood Borne Pathogens exposure control within 48 hours. The exposed employee will receive general blood borne pathogen training pursuant to OSHA 1910.1030 requirements.

HEAT STRESS

Work involving high air temperature, radiant heat sources, high humidity, direct physical contact with hot objects or strenuous physical activities have a high potential for inducing heat stress in workers engaged in construction activities.

Age, weight, degree of physical fitness, degree of acclimatization, metabolism, use of alcohol or drugs

and a variety of medical conditions all affect a worker's sensitivity to heat. Even the type of clothing the worker wears must be considered. Prior heat injury predisposes a worker to additional injury. It is difficult to predict just who will be affected and when, because a worker's susceptibility varies. Environmental factors include more than ambient air temperature. Radiant heat, air movement, conduction and relative humidity all affect a worker's response to heat.

Workers should consume adequate liquids and take necessary rest breaks to help prevent heat disorders. It is recommended that water be consumed rather than carbonated beverages or sport like Gatorade. These beverages can dehydrate a worker because of the sugars and other ingredients contained in the beverage.

Should project conditions warrant, the project superintendent shall identify a competent person to manage the site specific heat stress program. The program may include, but not limited to, the following items to improve early detection and action.

- Establishment of a buddy system
- Utilization of a hydration monitor to both observe for symptoms of heat-related illness and insure adequate levels of hydration is being maintained
- Hazard identification
- Water, shade, rest message
- Acclimatization
- Modified work schedules
- Training
- Engineering controls
- Monitoring for signs and symptoms
- Emergency planning and response

Heat Disorders and Health Effects

Heat stroke: Occurs when the body's system of temperature regulation fails and body temperature rises to critical levels,

Heat stroke is a medical emergency. Do not send worker home or leave unattended.

Primary Signs and Symptoms:

Confusion Convulsions Irrational Behavior Lack of sweating Loss of conscious Hot dry skin

Heat Exhaustion: Symptoms often are non-specific and may be sudden in onset; these symptoms often resemble a viral illness. It is caused from dehydration where a large loss of body fluid causes a slowing of the circulatory system.

REMOVE FROM HEAT, GIVE FLUIDS, AND ADEQUATE REST.

Primary Signs and Symptoms

Fainting/Weakness Thirst Giddiness Vertigo Headache Nausea

Heat Cramps: Usually caused by performing hard physical labor in a hot environment. They are caused from an electrolyte imbalance caused from sweating. Cramps can be caused by too little or too much salt.

GIVE WATER OR A COMMERCIAL CARBOHYDRATE-ELECTROLYTE REPLACEMENT LIQUID (Gatorade) EVERY 15 TO 20 MINUTES.

HAZARDOUS COMMUNICATION/SDS

NOTE: Our projects do not require the use of Hazardous Materials with the exception of the diesel and oils used in the pickup trucks and equipment. The following are rules and guidelines to follow should a project arise requiring the use of Hazardous materials.

All contractors will submit their hazardous communication program and SDS to the FBI Construction project superintendent prior to the start of work. Unless designated otherwise, the Superintendent serves as the site hazardous communication coordinator. The following information will assist in understanding OSHA Hazardous Communication requirements:

List of Hazardous Chemicals

The superintendent will maintain a list of all hazardous chemicals. This list will be located in the superintendent's trailer and available for all employees upon request.

Safety Data Sheets (SDS's)

The project superintendent and or project manager will maintain a notebook containing contractors Hazardous Communication Program and SDS's. The notebooks will be located in the jobsite trailer and be readily available to all employees during their work shift.

Information on the SDS's must contain the following and be consistent with the UN Globally Harmonized System of Classification and Labeling of Chemicals (GHS)

- Name of product
- Hazardous ingredients and primary entry into the body
- Physical data
- Fire and explosive data
- Health hazards
- Reactivity
- Spill or leak procedures
- Special protection information
- Special precautions

Each supervisor or lead man will monitor their employees under his direct supervision for proper training and proper precautions prior to the hazardous chemical's introduction to the jobsite.

All hazardous chemicals introduced into the work site will have an SDS. If supplier or manufacturer fails

to supply an SDS, the subcontractor will contact the supplier.

Labels and Other Forms of Warning

The superintendent and/or project manager is designated to ensure that all hazardous chemicals on the construction site are properly labeled, tagged, or marked with the following information:

- Identity of the hazardous chemical(s)
- Appropriate hazard warnings
- Name and address of the manufacturer, importer, or other responsible party

Since chemical manufacturers are required to label their containers of hazardous chemicals, we will use these labels as our primary means of warning employees about the product. Labels are not to be removed from any container or defaced in any manner. If a label is missing or illegible, notify subcontractor supervisor or project superintendent immediately.

The superintendent and/or project manager will refer to the corresponding SDS to verify label information. Small containers into which materials are transferred for use are required to be labeled with the identity of the hazardous chemical (s) and appropriate hazard warnings.

The superintendent and or project manager will ensure all containers upon receipt onsite and monthly thereafter, and that the labels are up to date.

Training

Each employee who works with or is potentially exposed to hazardous chemicals will receive initial training on the Hazard Communication Program and the safe use of those hazardous chemicals. Additional training will be provided for employees whenever a new hazard is introduced into their work areas.

The training will emphasize these elements:

- A summary of the standard and this written program.
- Hazardous chemical properties including visual appearance and odor and methods that can be used to detect the presence or release of hazardous chemicals.
- Physical and health hazards associated with potential exposure to work place chemicals.
- Procedures to protect against hazards, e.g., personal protective equipment, work practices, and emergency procedures.
- Where SDS's are located, how to understand their content, and how employees may obtain and use appropriate hazard information.
- Employees shall be routinely tested to ensure they understand the hazard communication program.

It will be FBi Construction's policy to provide training regularly at Tool Box meetings as the hazards change or when a new chemical hazard is introduced to the jobsite.

Contractor Employees

Project superintendent will advise subcontractor's foreman of FBi Construction's hazardous chemical list during the safety orientation. In addition, the contractor's foreman will be notified of the location and availability of SDS s.

Each contractor bringing chemicals onsite must provide a copy of their written Hazardous Communication Program including all SDS' to FBi Construction's superintendent prior to mobilization on the jobsite. The superintendent will maintain company's Hazcom program until subcontractor finishes their work.

Community Right to Know

Each project location will cooperate with city and county officials to comply with requirements of the OSHA standards regarding hazardous materials onsite.

PROCESS SAFETY MANAGEMENT/ CONTRACTOR REQUIREMENTS

Process Safety Management is put in place to eliminate hazardous consequences of catastrophic release of toxic, reactive, flammable or explosive chemicals in various industries such as refineries, etc. Should a specific project require PSM then each team member will be trained in work practices necessary to perform their job and all team members will be advised of any unique hazards created or encountered by work or work practices

Each team member must be trained in the known potential fire, explosion or toxic release hazards related to their job and the process and applicable provisions of the emergency action plan. All team members must respect confidentiality of trade secret information when process safety information is released to them.

Head Protection

An approved hard hat must be worn at all times (should state and federal regulations for the project require).

- Hard hats must be properly maintained.
- Ball caps, or other head gear not specifically designed to wear with a hard hat will not be allowed. Headgear conforming to the crown of the head would be acceptable to wear under hard hats.
- Hard hats must be worn with the bill facing forward except when reversing the suspension is allowed by the manufacturer to accept a welding shield or other face shield.

Eye and Face Protection

- Safety glasses with side shields must be worn as may be required.
- Workers that wear prescription safety glasses may do one of the following:
 - o Obtain prescription safety glasses (Z87.1) with rigid side shields.
 - o Wear over- the- glass safety glasses.

Foot Protection

- Hard soled work boots or shoes above the ankle that are in good condition must be worn at all times. Safety toed work boots if worn must conform to ASTM F2412-05 & ASTM F-2413-05. Athletic shoes, sandals, or other street-type shoes are not allowed, even if they have steel toes.

Work attire

- Long sleeve shirts are recommended, but not required. No shorts, tank tops, or cut-off shirts are permitted.
- All personnel may be required to wear a reflective vests or high visibility clothing while in the designated work Zone if required. During the hours of dusk to dawn ANSI class II reflective vests or clothing shall be worn if required.
- Long pants that fit properly around the waist. Shorts or pants that are being worn low on the hips or thigh are not allowed. The length of the pants will be such to not present a tripping hazard.
- Long hair must be contained under the hat.
- Loose Rings, chains, bracelets, dangling earrings, or other loose jewelry will not be worn when working near or on machinery, equipment, or moving parts.

Hearing Protection

Approved hearing protection is recommended to be worn while working with or around high-noise level producing machines, tools, or equipment; but not required.

Hand Protection

Workers will wear cut resistant gloves whenever necessary to prevent hand and finger injuries. The project safety supervisor can assist in recommending the correct glove for the task. Note: Level of cut resistant gloves to be determined by contractor's Competent Person.

HAND AND POWER TOOLS

All Hand and power tools will be kept in good condition with regular maintenance. Hand and power tools are to be operated according to manufacturer's instructions and guidelines and the personal protective equipment appropriate for the hand or power tool will be worn.

Hand Tools

- Impact tools such as chisels, wedges, etc are not to have mushroomed heads.
- Wooden handles will not be splintered or cracked.
- Pocket knives should not be used for stripping wire unless protective gloves are worn with a minimum cut level of 2.

Electric Tools

- Never lift or carry a power tool by its cord.

- Guards and safety switches will not be removed or made inoperative.
- Electric tools must have a three-wire cord unless double insulated.

Portable Abrasive Wheel Tools

- Guards will not be removed.
- Grinding discs and wheels will be checked to verify they are the correct one for the grinder and rpm.

Pneumatic Tools

- Air hoses ½" in diameter or greater will have a safety excess valve installed at the source of air.
- Clips or retainers are required to prevent attachments from being ejected from the tool.
- Pneumatic nail guns shall be disconnected from the air supply when unattended.

HOUSEKEEPING AND ORDERLINESS

Project management, supervision, workers, vendors, and third party persons, shall maintain all work locations in an orderly and clean manner at all times. Daily cleanup of work areas is mandatory for all trades on site.

UP G LLC Cleanliness Standard

Designated areas for construction debris (fiber, poly, mule tape etc) and or specific dumpsters pursuant to contract requirements will be provided. All miscellaneous trash generated by workers shall be deposited in a container or in the back of pickup trucks and transported to the designated dumping garbage area. There will be no bottles, food wrappers, cups and etc thrown on the ground, trucks and or equipment. When dumping area becomes ¾ full UP G, LLC will designate an employee to load and haul all garbage and waste material to the local landfill. Subcontractors shall pursuant to contract obligations allocate adequate resources to ensure this housekeeping standard is maintained throughout their time on the project. Project team shall address this housekeeping standard with all subcontractors prior to beginning work.

Specific housekeeping /cleanliness requirements are defined in this document.

General Housekeeping Requirements:

All materials, equipment and etc. brought on site shall be organized and stored in areas designated by project team. Trade partners are responsible for organizing material, equipment and tools so they do not create a tripping hazard or impede/block exits out of the area or rooms they are working in. Trade partners are responsible for daily clean up of excess material and debris. Excess material and debris shall be deposited in appropriate containers throughout the day. Areas and rooms where multiple trade partners are working each trade partner shall clean up their own excess material and debris. When work is completed in a room or area all excess material and debris shall be removed and broom cleaned. Housekeeping is an important part of our daily work. With the cooperation of everyone we can keep our areas clean and neat, and free from tripping hazards. Take the time to think safety. With your help,

accidents can become a thing of the past.

Electrical Power Cords

- Perhaps the most abused tool on the construction job site is the electrical power cord. They are kinked, twisted, cut, pulled and crushed almost constantly.
- Unfortunately, these damaged cords also take their toll in injuries and even fatalities. In one incident, a worker was installing ventilation ducts and received a slight shock from the exposed conductor on a damaged electrical cord. The shock didn't kill him, but he fell backward four feet off a scaffold and struck his head. The fall paralyzed him permanently from the waist down.
- Don't take electrical cords for granted. They can be a big help to us, but they can also hurt. Keep these pointers in mind:
- Visually inspect the cord for damaged and exposed conductors. If the cord is in damaged condition, don't use it, take it out of service.
- Inspect to make sure the ground prong is in good condition and the cord provides a satisfactory ground for the electrical tools being used.
- Don't drag cords over rough surfaces and don't use them to lift or pull materials. Electrical cords were not designed to function as ropes.
- Don't disconnect cords by jerking them out. They should be disconnected at the receptacle.
- Don't string electrical cords through water or oil and grease. Also, don't hammer nails or staples into cords.
- When not in use, the electrical cord should be neatly coiled and stored.
- Only round cords that are rated for heavy duty use are allowed. Never use flat power cords.
- With just a little respect, electrical cords can provide us with long and safe services.

TRENCHING & EXCAVATION SAFETY

- Prior to any excavation or trenching on this project, the following must be performed:
- Any contractor engaged in trenching operations deeper than 5 feet shall designate a competent person and inform FBi Construction Site Superintendent.
- Underground utilities must be located. Underground utility locating authorities must be given the required advance notice.
- Trenches or excavations greater than 5 feet in depth will be sloped, benched, or otherwise protected from cave-ins accordance with OSHA Subpart P and as determined by the Competent Person. Sloping, benching or other protective systems are recommended for any trenches and excavations over three feet in depth.
- Protective systems designed to be placed in trenches such as trench boxes must have tabulated data available for review as necessary.
- Spoil piles and other materials will be placed a minimum of 2 feet from the edges of all trenches and excavations.
- In trenches deeper than four feet, locate means of egress, such as ladders or steps or ramps (45 degree slope), so they are no more than 25 feet of travel from anyone in trench.

- A competent person must inspect the trench, adjacent areas, and any protective systems for possible cave-ins, failure of protective systems, and hazardous conditions. Inspections must be performed daily before work begins and after every rainstorm or other hazardous conditions.
- A registered professional engineer must design all excavations and protective systems over 20 feet in depth.

UNDERGROUND UTILITY LOCATIONS

Any contractor who digs a trench or excavation to install project utilities public or private shall call MT 811 Dig Safety ([406-442-3070](tel:406-442-3070)) or www.montana811.org (for Montana Projects) 2 business days prior to digging.

Before digging, be sure that all utilities have responded to your locate request. The utility locate representative will advise you during your call of the member utility owners notified. It is the responsibility of the caller (subcontractor) to contact a utility locating company to have any private lines located. The underground facilities located by 811 or the Private Utility Locate Company will be identified by color coded paint, stakes or flags. Once the underground facilities have been located it is very important that the stakes, flags or paint not be disturbed. Notification will be good for 30 business days. However, the request should be updated on the 28th business day, if the work will not be completed by the end of the 30th business day.

EQUIPMENT AND VEHICLES

- Heavy equipment (plows, excavators, drills, etc.) used on this project will be inspected prior to use and comply with applicable OSHA and ANSI standards.
- Seat belts shall be worn on all equipment with roll-over protective structures.
- Equipment that is equipped with windshields will be free from cracks or other visible damage.
- Vehicles and equipment with an obstructed view to the rear must have an audible backup alarm or a flagman must be used.
- No equipment or vehicle will be used to transport personnel unless it is specifically designed to do so.
- Equipment operators are responsible to check their equipment daily to verify it is working properly. Minimum inspection items include:
 - o Brakes
 - o Lights
 - o Backup alarm
 - o Hydraulic systems
 - o Steering mechanism
 - o Operating controls
 - o Mirrors
 - o Fire extinguisher

- Equipment operators will possess the required training, certification, and licenses as required by law for the equipment that they are required to operate. All forklift operators shall have a valid operator's license.
- All equipment will be inspected on a daily basis at the beginning of the work shift
- Avoid driving while distracted. Distracted driving may include texting, reading, e-mailing, or cell phone use.
- Operate all vehicles in a safe manner, using defensive driving techniques. Do not drive aggressively.
- Drivers shall observe all federal, state, and local laws and ordinances.

ERGONOMICS

Workers should be aware of the work practices to avoid musculoskeletal disorders, strains, and sprains. These practices include, but are not limited to, the following areas.

- Avoidance of awkward postures, excessive repetition, and contact stress (hard edge/pressure)
- Alternate work patterns and tasks throughout the day
- Perform stretching exercises periodically
- Begin or continue a physical fitness program
- Adjust working height of chair, desk, or keyboard
- Adjustment of computer monitor
- Keep wrists and hands in line while using a keyboard and mouse
- Organize work areas to avoid stretching and twisting to reach items
- When lifting, holding, or pushing workers should avoid strains and sprains caused by incorrect posture, lack of proper assistance and/or lifting aids
- Test the weight of the load before lifting and let your arms and legs do the work, not your back
- Get help when needed

WILDLIFE AWARENESS

When working outside there are many animals, plants, and insects that could potentially cause harm. Some of these may include, but not be limited to, snakes, insects, wasps, yellow jackets, ticks, poison oak/ivy, alligators etc. The following measures can be taken to avoid harm.

- Use insect repellent
- Dress appropriately
- Wash properly after potential exposure
- Avoid reaching into areas that you cannot see into
- Seek medical treatment if you exhibit symptoms of illness or allergic reaction to bites or stings

ENVIRONMENTAL POLICY

UP G, LLC, in its role as a construction company, acknowledges that the company and its activities have a significant impact on the environment. We have identified the key areas as energy, water, waste, transport, hazardous materials, business operations, biodiversity and health. We aim to protect and improve the environment by an in-depth analysis, identification and measurement of these environmental aspects and impacts and to set targets to reduce them.

We are committed to reducing our waste and are working hard to adopt and implement standards in good practice to prevent, reduce and recycle the materials used during our operations.

Our Commitment is to:

- Identify, meet or exceed the environmental legislation, standards and codes of practice that relate to the Company's activities.
- Continuously improve our environmental performance and integrate environmental best practice into our business operations.
- Reduce our consumption of resources and improve the efficient use of those resources.
- Manage waste generated from our business operations according to the principles of reduction, re-use and recycling.
- Continue to improve our environmental performance through effective communication, provision of staff training and adoption of best techniques available.
- Manage our business operations to prevent pollution.
- Ensure environmental, including climate change, criteria are taken into account in the procurement of goods and services.
- Be a respectful neighbor by minimizing the impact that our activities, sites and premises have on local communities.
- Protect and, where feasible, enhance biodiversity on sites and premises where we hold responsibility or can influence those who do.
- Seek to influence our clients to adopt, and our designers to provide, solutions that benefit the environment.

To meet our commitments we will:

- Use recycled waste and demolition products where possible and use waste management contractors who have similar environmental policies as ours.
- Use recycled aggregates where practical
- Regular service our portable machinery to control pollution.
- Reduce and replace the use of 'toxic chemicals' with 'green' replacements where possible.
- Use CFC free products.
- Regularly maintain and service our vehicles to ensure emissions are kept as low as possible.
- Maximize delivery of materials and reduce return trips made by unladen vehicles.
- Identify our waste streams and reduce material wastage by carefully planning recycling, reusing

and selective ordering.

- Use peat alternatives in landscaping and ensure that mature trees are retained, wherever possible, on-site.
- Implement office recycling.
- Minimize the need to travel but, where travel is unavoidable, use modern and efficient modes of transport.

SCHOOL SAFETY PLAN

UP G, LLC plans to achieve school campus site safety and health for all students, staff and personnel present in the operational school environment on-site, through the following measures:

- All required OSHA, OSF and school specific safety guidelines, per plans and specifications, are to be adhered to at all times.
- The ongoing safety of students, staff and contractors is of utmost importance.
- There shall be absolutely NO communication of any kind between any contractor employee and students. Any necessary communication between contractors and school staff shall be directed through the general contractor and the applicable school district staff.
- Each trade contractor is to have a site “competent person” on-site at all times during the on-site performance of their work scope. The “competent person” means one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, students or school staff and who has authorization to take prompt corrective measures to eliminate them.
- It is necessary to provide proper protection to the school population, workers and pedestrians. As required by the contract documents, this protection includes but is not limited to, proper fire protection, temporary fencing, means of egress, scaffolding, sidewalk sheds, temporary walkways and proper signage.
- Performing construction activities in or near an occupied school demands the highest level of loss prevention. Every effort must be made to evaluate, eliminate and reduce the hazards posed to the school occupants and the public on projects that are concurrent with school activities. Any work related condition deemed to be unsafe must be corrected **immediately**.

CODE OF CONDUCT /WORKPLACE VIOLENCE

Nothing is more important to UP G, LLC than the safety and security of its employees and contractors. Threats, threatening behavior, or acts of violence against employees, contractors, visitors, guests, or other individuals by anyone on company property or projects sites will not be tolerated. Violations of this policy will lead to disciplinary action, which may include termination of employment.

Any person who makes substantial threats, exhibits threatening behavior, or engages in violent acts on UP G LLC’s property or project sites will be removed from the premises as quickly as safety permits, and

shall remain off UP G, LLC property or project sites pending the outcome of an investigation. UP G, LLC will initiate a decisive and appropriate response. This response may include, but not limited to, suspension and/or termination or any business relationship, reassignment of job duties, suspension or termination of employment, and or criminal prosecution of the person or persons involved.

In carrying out these UP G, LLC policies, it is essential that all personnel understand that no existing UP G, LLC's policy, practice, or procedure should be interpreted to prohibit decisions designed to prevent a threat from being carried out, a violent act from occurring, or a life threatening situation from developing.

All UP G, LLC employees are responsible for notifying their supervisor or the Safety Director of any threats, which they have witnessed, received, or has been told that another person has witnessed or received. Even without an actual threat, personnel should also report any behavior they have witnessed which they regard as threatening or violent, when that behavior is job related or might be carried out on a UP G, LLC controlled project site, or is connected to UP G, LLC employment. Employees are responsible for making this report, regardless of the relationship between the individual who initiated the threat or threatening behavior and the person or persons who were threatened or were the focus of the threatening behavior.

This policy also requires all individuals who apply for or obtain a protective restraining order, which lists company locations as being protected areas. Provide to the Safety Director a copy of the petition and declarations used to seek the order, a copy of any temporary protective or restraining order which is granted, and copy of any protective or restraining order which is made permanent. UP G, LLC understands the sensitivity of the information requested and confidentiality procedures will be used.

MOTOR VEHICLE OPERATIONS

Distracted Driving

1. Texting, reading texts and emailing are prohibited when driving company vehicles and when driving personal vehicles on company business.
2. Follow state and local regulations on use of cellphones when driving.
3. Focus on the primary task of driving. Keep the number of calls to a minimum amount and duration.
4. Use of pagers, laptops, PDA's camera's and other electronic devices while driving is prohibited.
5. Avoid other activities that may distract your driving. Pull over or park in safe locations to perform these activities.
6. While operating motor vehicles, do not use a cellphone when driving unless necessary. If you have to use a cellphone, it must be used with a hands-free device. Hand-held cellphones shall not be used to send or receive text messages or emails or access other applications (Internet, camera, etc.) while driving a motor vehicle.

Operational Practices

1. Operate all vehicles in a safe manner, using defensive driving techniques. Do not drive aggressively.
2. Drivers/operators shall have full responsibility for vehicles in their possession. This includes observing all federal, state and local laws and ordinances.
3. Drivers shall be properly licensed when operating company-owned, rented, leased vehicles or equipment, and personal vehicles when used on company business. Any license restrictions shall be adhered to at all times.
4. Before operating a vehicle, visually inspect it to determine whether the vehicle is safe to operate. Perform a "360 degree" inspection around the vehicle to be sure the area is clear. Do not operate unless equipment is in safe condition.
5. Seat belts, where provided, shall be worn by the driver and passengers at all times when the vehicle or equipment is in motion. This shall apply to all company-owned, rented, leased vehicles or equipment, and to personal vehicles when used on company business or on company property.
6. Passengers in motor vehicles shall be in approved riding positions and restrained where occupant restraints are provided.
7. Lock unattended vehicles and remove keys to reduce the risk of vehicle theft.
8. Respect speed limits and traffic signs. Follow all traffic signals.

Backing and Chocking

1. If you can pull through into a parking place, do so, instead of backing the vehicle into the space.
2. When a second person is available, they should assist the driver with backing.
3. Where applicable, it is preferred to back into a designated parking space in lieu of pulling forward to park.

Emergencies

1. In case of any vehicle trouble, pull off to the right side of the road, if possible, and use emergency flashers and warning signals.
2. If immediate emergency call 911 and then contract UP G, LLC Superintendent and/or foreman. If not immediate emergency contact UP G, LLC Superintendent and/or Foreman first.

Incident Reporting

1. Drivers are required to document all details of the accident: traffic flow, speed limits, stop lights/signs, weather conditions, citations issued and all other relevant information. Pictures should be taken to document the extent of damage to all vehicles involved.
2. If an employee is in an accident involving a company-owned vehicle, leased (rental) or personal

vehicle being used on company business, the employee must report the incident immediately to supervisor.

3. If an employee has an injury from any kind of vehicle accident while on company business, the incident must be reported immediately to supervisor.
4. Employees who receive a citation for any vehicle violations while operating any FBI-owned vehicle shall report the citation immediately to their supervisor.
5. All accidents and moving violations must be reported within 24 hours of occurrence.