



Safety, Health, and
Loss Prevention Program

ScottBuild.com

12 Division Street | Buffalo, MN 55313

763-684-0000 | 877-684-0007

rickscott@scottbuild.com

Table of Contents

General	Section 1
Policy Statement	
Program Introduction	
General Safety Rules and Policies	
Subcontractor Management Plan.....	
Subcontractor Safety Program Requirements	
Subcontractor Fall Protection Program Requirements	
New Employee Loss Prevention Orientation.....	
New Employee Loss Prevention Orientation Guide.....	
Environmental Policy.....	
Sexual Harassment and Discrimination Policy.....	
Waste Management Policy.....	
Responsibilities	Section 2
President.....	
Environmental Health and Safety Officer.....	
Superintendent	
Employee	
Safety Team Roles and Responsibilities.....	
Hazard Identification/Assessment	Section 3
Hazard Identification Overview.....	
Job Hazard Analysis	
Standard Operating Procedures	

Job-Site Inspection Checklist.....

Accident Investigation

Maintenance.....

Job Hazard Analysis and Control

 Pre-Construction Review Inspection

 Daily On-Site Inspections.....

Formal Inspections.....

 Job-Site Inspections

 Environmental Monitoring

 Job-Site Safety Audits

 Job Hazard Analysis and Control

 Employee Training to Identify Hazards.....

Hazard Assessment Process.....

 Prioritizing Hazards.....

 Hazard/Severity

 Hazard Probability

 RAC Descriptions

 RAC Abatement.....

 Methods of Correction.....

Forms.....

 Job-Site Inspection Report.....

Training

Section 4

General.....

Specific Training.....

Safety Training

Objectives

Job Task Training

Employee Responsibility for Training.....

Accident Investigation

Section 5

General Statement.....

General Investigation Process.....

Accident Investigation

Near Misses.....

Sources of Accident Information

Accident Investigation Procedures.

Records

OSHA Records Required.....

Reporting

Forms.

 Employee Injury Report.....

 Supervisor Accident Investigation Report.....

 Near Miss / Hazard Notification.....

 Property Loss

Enforcement

Section 6

Work Practices and Rules Enforcement

 Schedule of violations and resulting penalties.....

Employee Forms.

 Verbal Warning.....

 Written Warning

 Suspension

 Termination.....

 Employee Discussion.....

 Notice of Unsatisfactory Performance.....

 Employee Review... ..

 Subcontractor Forms.

 Verbal Warning.....

 Written Warning

 Removal from Premise

 Discussion.

 Notice of Unsatisfactory Performance.....

 Review.. ..

Annual Objectives

Section 7

Forms.

Action Plan.....

Return to Work

Section 8

Policy Statement

Program’s Working Guide.....

The Program.....

Medical Care.....

Claims Coordinator.....

Modified Work.....

Claims Coordinator/ Superintendent Guidelines

 Responsibilities of the Claims Coordinator

 Responsibilities of the Superintendent

Forms

 First Report of Injury

 Workability Form.....

 Job Offer Prior to Maximum Medical Improvement(MMI).....

 Permanent Job Offer After MMI

 Injury Information for Physicians.....

 Employee Information Sheet

Workers' Compensation

Section 9

General.....

 Insurance.....

 Coverage

 Work Related Disability

 Benefit Types

 Maximum Medical Improvement

Reporting a First Report of Injury

 Time Limitations.....

Death or Serious Injury.....

Drug and Alcohol Testing – General Information

Section 10

Who May Be Tested.....

Drug & Alcohol Testing May Not Be Performed Unless.....

Right to Require Testing.....

Refusal to Take Test.....

Testing Standards.....

Right to Discipline.....

Confidentiality.....

Effect on Workers Compensation Injuries.....

Caveats.....

Scott Builders, Inc.

Safety, Health and Loss Prevention Program Policy Statement

Scott Builders, Inc. is committed to provide our employees a safe and healthful working environment and to the elimination of loss leading to the conservation of human and corporate resource. This policy mandates a corporate wide Safety, Health and Loss Prevention Program with the goal of providing a work environment free from recognized hazards.

The Safety Health and Loss Prevention Program has the following objectives:

1. To preserve Scott Builders, Inc.'s most important asset, its Employees, by reducing or even eliminating the risk of injury and illness.
2. To minimize or even eliminate property, equipment, and product damage.
3. To comply with all federal, state, and local safety and health regulations.

The following directives are established to achieve the Safety, Health and Loss Prevention Program objectives:

1. All levels of Management will work to provide an environment free from recognized hazards in a joint effort with all Employees.
2. Scott Builders, Inc. will provide and properly maintain all equipment needed and used in providing services and the completion of projects.
3. All levels of Management will follow all policies and procedures when training Employees to perform their job tasks. All Employees are expected to perform job tasks as trained, and to bring to the attention of their Immediate Supervisor when not job task trained.
4. All Employees will abide by all federal, state, and local safety and health regulations governing our industry and those standards established by the Company.
5. All Employees will respect the persons and property of owners, customers and the general public in the conduct of Scott Builders, Inc. business.
6. All Employees will follow all work polices, procedures, and regulations.
7. All Employees will communicate to their Immediate Supervisor any conditions that are inconsistent with Scott Builders, Inc.'s Safety, Health and Loss Prevention Program.

All Employees are accountable for the implementation of the Program. All Employees are expected to notify their Immediate Supervisor according to standard procedures on any conditions or procedures that may result in personal injury or illness to themselves, their fellow employees, their fellow co-workers and the general public or in damage to property.

Rick Scott, President Signature: _____

Scott Builders, Inc.

Safety, Health, and Loss Prevention Program

Introduction

State and federal law, as well as company policy, makes the Safety and Health of our Employees the first consideration in operating our business. At Scott Builders, Inc. Safety and Health is part of every operation, and is part of every Employee's responsibility at all levels. It is the intent of Scott Builders, Inc. to comply with all laws concerning the operation of the business and the Health and Safety of our Employees and the public. To do this, we must constantly be aware of conditions in all work areas that can produce or lead to injuries. No Employee is required to work at a job known to be unsafe or dangerous to his or her health. Employee's cooperation in detecting hazards, reporting dangerous conditions and controlling workplace hazards is a condition of employment. Inform your Immediate Supervisor immediately of any situation beyond your ability or authority to correct. Employees will not be disciplined or suffer any retaliation for reporting a Safety violation in good faith.

Safety First Priority

The personal Safety and Health of each Employee of Scott Builders, Inc. is of primary importance. Prevention of occupational-induced injuries and illnesses is of such consequence that Employees are to notify their Immediate Supervisor before performing the work task that is considered dangerous, a violation of a regulatory standard, or may likely result in an injury. Scott Builders, Inc. will make every effort to provide mechanical and physical protection required for personal Safety and Health. Employees must bear primary responsibility for working safely, performing their work as trained and informing their Immediate Supervisor of defective mechanical equipment and lack of physical protection. A little caution and keeping your mind on the task at hand can prevent a lot of accidents from happening.

Individual Cooperation Necessary

Scott Builders, Inc. maintains a Safety and Health Program conforming to the industry practices of our field. To be successful, such a Program must embody proper attitudes towards injury and illness prevention on the part of all levels of management and all Employees. It requires the cooperation in all Safety, Health and production matters, not only of the Employer and Employee, but between the Employee, and all co-workers. The Employee work practices may very well impact the general public doing business with the company.

Therefore it is the policy of Scott Builders, Inc. that all Employees protect the general public from hazards on our property or services rendered on the customers premise. This is effectively done by following the procedures, work practices, and hazard recognition identified in the Company's Safety, Health, and Loss Prevention Program.

Only through such a cooperative effort can a Safety, Health, and Loss Prevention Program be established and preserved: it is in the best interest of all. Safety is no accident; think safety, report hazard conditions, perform the job as trained, and the job will be safer.

The **EHS Officer** who is responsible for Scott Builders, Inc.'s Safety Program is *Donald Garee*. This person has sufficient authority to implement the Program. In addition to other titles, this person is called the Environmental Health and Safety Officer (EHS). At Scott Builders, Inc., the Site Superintendent is the Company's on-site coordinator of the Program.

Communication

Scott Builders, Inc. will communicate to Employees our commitment to Safety and to make sure that Employees are familiar with the elements of the Safety Program. Scott Builders, Inc. communicates with its Employees verbally through the EHS Officer by directions and statements, written directives, this manual, and by example. If you see a fellow Employee do something unsafe, please, constructively tell that person. We sometimes forget actions speak louder than words.

Each new Employee will be given a New Hire Safety Orientation and a copy of the Company's Safety, Health, and Loss Prevention Program. Employees will receive periodic training, and, wherever possible, make available self study training videos and other aids for use.

The Site Superintendent on the job-site will outline conditions pertaining to each task:

- A. Work and Safety rule
- B. Specific hazard inherent to the position
- C. Job skills necessary to perform the task
- D. How to respond in case of an emergency
- E. Establish an acceptable level of effort or output for the position
- F. Define in the clearest possible terms what is considered to be a proper job performance incorporating the Company's Safety, Health, and Loss Prevention Program.

BEHAVIOR BASED SAFETY

I. PURPOSE

A very effective way to promote a safe work environment is through modifying and correcting a workers unsafe behavior. By observing an employee during the work day, those unsafe behaviors can be identified and modified to eliminate the potential for accidents or incidents occur. Scott Builders, Inc. encourages all of their employees and sub-contractors to work safely because they want to rather than work safely because they

are told to. Behavior-Based Safety is a process that helps employees identify and choose a safe behavior over an unsafe one.

Safety in the workplace is a combination of three measurable components: the person, their environment, and their behavior. Only when these three elements are combined can workplace accidents be eliminated.

II. TRAINING

Before being involved in the observation process, the Superintendent must receive training on what a Behavior Based Safety system involves including how to complete a proper observation of an employees work habits, what different behaviors might mean, how to ask open ended questions rather than ask a question requiring a simple “yes” or “no” to answer, how to solicit feedback from the employee without fear of intimidation or harassment, how to coach an employee to change an unsafe behavior and the importance of participation to improve overall safety on the jobsite.

III. PROCESS

1. Behavior-based safety is based on four key components:

- A behavioral observation and feedback process;
- A formal review of observation data;
- Improvement goals, and
- Reinforcement for improvement and goal attainment.

2. Behavioral Observation and Feedback:

This is one of the most important components of the process. Observations provide direct, measurable information on employees’ safe work practices and will be performed by the Superintendent.

- Employees will be observed performing their routine task. The Superintendent must document both safe and unsafe behaviors.
- The employee is then provided positive feedback on the safe behaviors and non-threatening feedback on the unsafe behaviors. The employee will be provided with suggestions on correcting the unsafe behaviors.
- The Superintendent will have a discussion with the employee to see if there is a specific reason for any unsafe behaviors. It will be stressed with the employee that there is no consequence to the employee for the observation process.

3. Formal Review of Observation Data:

The information collected during the observation process must be analyzed to determine the employee’s improvement in safe behaviors.

- All information collected will be reviewed by the Superintendent and EHS Officer monthly to identify any trends in improvement of observed behaviors.
- All initial observations will be used as a base line and all future observations of the same worker will be used to track any positive improvements. If the trends are showing less behavioral change or disregard for safety the worker showing this

trend will be interviewed by upper management to see what possible issues exist and get feedback from the employee on how to improve overall safety on the job.

- Once a trend analysis is completed the EHS Officer along with feedback from the Superintendent, will establish an action plan to address the unsafe behaviors observed. The Action Plan must include but not be limited to, designating the responsible parties and any timeframes for correcting these issues. All corrective actions have the total support of Scott Builders, Inc.

JOB COMPETENCY

I. SCOPE

In order to determine that Scott Builders, Inc. has employees capable of properly performing their assigned tasks in all levels of employment within the company, Scott Builders has an Organizational Chart establishing reporting levels and responsibilities. This chart shows the job titles and roles of all employees within the company structure.

II. PROCESS

- a. All prospective new-hires are required to submit a resume' showing education and work experience. The resume' is reviewed by the President of Scott Builders to verify the prospective new-hire meets the minimum qualifications required for the position. The minimum qualifications for each position in the company have been outlined in detailed job descriptions found in the Scott Builders corporate office.
- b. Once the resume' has been reviewed, the prospective new-hire will be contacted to supply any documentation verifying the stated education and work experience. If at any time a prospective new-hire does not or cannot provide the requested supporting documentation, they will be removed from consideration for the position until the requested information is supplied to Scott Builders. The prospective new-hire will be asked to give written authorization to Scott Builders to seek any supporting verification from former employers and or educational systems. Once verification is completed a job offer may be tendered.
- c. Before being allowed to work in the field, all new-hires are required to be trained in accordance with this manual, on all safety related and required items. This training will be documented and saved for the employment duration and for no less than 1 year after leaving Scott Builders employment. This training will also include job specific training related to their roles and responsibilities within the company. All new-hires must work directly with a mentor until the Superintendent or President deems the person capable of working independently. This determination will be done through direct observations of the workers abilities and attitude on the job. Input from the assigned mentor will also be used as part of the evaluation process.

Scott Builders, Inc.

General Safety Rules and Policies

WORK SAFETY

1. Work Safely! If you don't know the proper way, stop and find out by asking your Immediate Supervisor.
2. Before the start of each workday, potential hazards must be identified, analyzed and controlled. Utilize the Job Hazard Analysis (JHA) System found in this program to complete this daily task.
3. Safety Tool-Box Talks are required to be held and documented on a weekly basis by the Foreman. Attendance and participation is required and of utmost importance.
4. If you see an Employee working in a careless manner, which is likely to cause injury to him/herself, or someone else, please warn this person about the dangerous situation. If it continues, inform your Immediate Supervisor.
5. If you see an Employee using equipment improperly that would cause equipment failure, product damage or whose action constitute equipment abuse, remind the individual about the proper method of operation. If it continues, inform your Immediate Supervisor.
6. When objects are too heavy or too bulky to handle for one person, ask for help or offer your help to lift or to push the objects. Always try to use any mechanical equipment such as two wheelers and/or hoists to assist in any lifts or moving objects.
7. Always inspect all tools and/or equipment before each and every use and use only well maintained tools and/or equipment while performing the job.
8. Always keep your mind on the task at hand, stay focused and "Think Safety"! If you feel you or any of your co-workers is not up to the task at hand, tell your Immediate Supervisor.

INDUSTRIAL HYGIENE AND OCCUPATIONAL HEALTH

1. Potable water must be provided at all sites in approved closed containers with disposable cups.
2. Adequate lighting must be assured in all work and egress areas.
3. Toilets must be provided as required for the number of workers, with self-closing doors, latch, and toilet paper.

4. During the winter months (November – March), adequate shelter and heated toilets must be provided to all workers exposed to the cold environment. (Minnesota Only)
5. First aid kits must be provided at each job site, and if a medical facility is not readily accessible, a person with a valid First Aid/CPR Certificate must be present.
6. Employees must be protected against exposure to ionizing (x-ray, radioactive) and non-ionizing (laser beam) radiation.
7. SDS Folder and Scott Builders, Inc.'s MN Employee Right-To-Know (Hazard Communication) Program must be readily accessible on every job-site and in the office for employee review.
8. Workers coming into contact with Portland Cement must have clean water, non-alkaline soap and clean towels available to wash their hands.

FATIGUE MANAGEMENT

1. During the new hire orientation all employees must be trained to recognize and how to manage fatigue through good personal and work habits. Annual retraining should be performed to improve an employee's awareness of fatigue related issues. All issues with fatigue are encouraged to be reported to the employee's supervisor. The supervisor must immediately evaluate the job task and make changes as necessary to the activity.
2. In safety critical situations it is the responsibility of the employee to recognize fatigue/tiredness and lack of mental acuity issues with themselves or fellow workers and to stop any work activity immediately that creates a hazardous condition. The employee must immediately report this issue to their immediate supervisor. The supervisor must direct the worker(s) involved to take a break and stay away from any task until the supervisor has evaluated the employees' condition and taken appropriate corrective action. All evaluations must be documented and reported to the Scott Builders office.
3. Scott Builders will control work place fatigue through administrative controls such as job rotation, limiting work hours, encouraging employees to get plenty of sleep while off duty, etc. These steps help increase mental alertness while on the job site and reduce employee errors and absenteeism. Work activity requiring repetitive motion will be evaluated for possible corrective measures; these evaluations must be done periodically.
4. Work areas will be configured to reduce or eliminate repetitive lifting, to have adequate lighting so an employee can see clearly, be temperature controlled if possible to reduce potential for heat related issues and if possible have some type of matting to help reduce the impact of the employees standing on hard surfaces.
5. Rest breaks are required at regular intervals per Department of Labor and Industry recommendations. As temperatures or heavy work activity increases, rest breaks must

become more frequent and possibly longer in duration. A place for the employees to sit during these rest breaks will be made available.

6. Chronic use of over the counter or prescription medications to increase mental alertness is discouraged. Once the affects wear off fatigue can set in.

HOUSEKEEPING

1. Good housekeeping and clean-ups are essential in accident and fire prevention and must be part of the daily routine. All Scott Builders, Inc. employees and sub-contractors are responsible for maintaining clean work areas and are required to perform a daily clean up.
2. Hoses, cords, materials and equipment must be kept out of main passageways, stairways and travel paths to minimize slipping and tripping hazards and to assure the safe passage of all workers in case of an emergency evacuation.
3. All excess materials must be stacked with due regard to safety and allowance made for easy access.
4. Whenever materials are dropped more than 20' to the next level, an enclosed chute must be used.
5. Protruding objects such as rebar, electrical conduits or marking stakes must be properly capped or otherwise guarded to protect workers from the impalement hazard.
6. All protruding nails in lumber must be pulled out or bent over.
7. Spills of oil, grease, or bulk cement must be removed immediately.
8. Areas around saws or other wood working equipment must be kept clean and free of excess scrap, chips, and sawdust.
9. Paper drinking cups, lunch debris and trash must be placed in trash barrels for removal from the area.
10. Remember, a clean job is a safer job.

DRUGS & ALCOHOL

1. No employee may consume alcohol or illegal drugs during working hours.
2. No employee may report to work under the influence of alcohol or drugs.
3. No employee may bring onto Scott Builders, Inc's property any alcohol, drugs or drug paraphernalia. Prescription drugs are allowable with a statement from your physician;

however, drugs that may impair an employee's ability or affect another employee's safety will be evaluated case by case for possible job reassignment.

4. The selling of drugs or drug paraphernalia or any related transaction during work hours and/or on Company premises will be cause for immediate dismissal

CONDUCT

1. Never distract the attention of another worker; you may cause an injury.
2. Horseplay, throwing objects, scuffling, and fooling around are very dangerous and will not be tolerated.
3. Do not remove any item, regardless of value, from the company premise without the approval of your Immediate Supervisor
4. Firearms or weapons are not allowed on company premises or site project.

INJURIES

1. Report all injuries, accidents or near misses to your Immediate Supervisor immediately. Fill out an Occupational Injury / Illness Investigation Report form (found in Section 5 of this document) as soon as possible following the injury or accident.

MN EMPLOYEE RIGHT-TO-KNOW (Hazard Communication)

1. When working with chemicals and hazardous substances, it is the Employee's right to know what he or she is working with and how those products can affect the Employee's life and health. It is the Employer's responsibility to educate the Employee and provide the information necessary for the Employee to educate him or herself. For detailed information please refer to Scott Builders, Inc.'s MN Employee Right-To-Know Program.

ASBESTOS AND LEAD

1. Scott Builders, Inc. has a "**Zero Exposure Policy**" when it comes to working with and/or around Asbestos and/or Lead or what seems to be Asbestos and/or Lead. If any employee finds or even suspects Asbestos and/or Lead in his/her workplace, the work must be immediately suspended and the Controlling Contractor / Building Owner must be notified of the situation. Scott Builders, Inc. employees will then evacuate the area if exposure to the Asbestos and/or Lead is possible until the Asbestos and/or Lead is abated and written proof of the abatement has been submitted by the Controlling Contractor and/or the Building Owner to Scott Builders, Inc.'s Management. At no time must any Scott Builders, Inc. employee disturb any form of Asbestos and/or Lead for no reason whatsoever.

PERSONAL PROTECTIVE EQUIPMENT

1. Personal Protective Equipment must be worn by all employees according to Scott Builders, Inc.'s Personal Protective Equipment Program.
2. Hard hats, safety glasses and high visibility garments are 100% mandatory.
3. When working in or around potential fire and explosion areas, Fire Resistant Clothing shall be required. At minimum, all cotton clothing must be worn. If exposure warrants, further levels of Fire Retardant Clothing might be required based on site specific conditions and need.

NOISE AWARENESS

1. All employees exposed to excess noise levels not covered by the Hearing Conservation Program found in the SHLPP Appendix must have knowledge of how noise causes physical damage and how to control the exposure. Training will be performed before initial assignment to a high noise environment and annually as needed.
2. Training must be updated when changes in PPE type and work processes occur. Training to include proper fit and use of hearing protection devices.
3. All hearing protection devices will be made available to each employee at no cost and replaced as necessary or according to the manufacturer requirements.
4. A selection of different types of hearing protection devices will be maintained by Scott Builders so the employee has a choice of style and design.
5. All employees exposed to noise levels of 85 dBA over an 8-hour TWA will be required to wear hearing protection or where required by posted signage.

CLOTHING

1. Do not wear jewelry, loose or torn clothing which can be caught in tools and/or machinery.
2. Long hair must be tied back or otherwise contained as suggested by your supervisor.
3. Long pants (jeans or heavy canvas, 100% cotton) and a cotton shirt that covers the shoulders are mandatory. Synthetic clothing is not allowed on certain job sites.

FIRE PROTECTION AND PREVENTION

1. A fire extinguisher, rated not less than 2A, will be provided for each work crew; it must be well maintained, conspicuously located and preferably mounted.

2. Housekeeping has an impact on fire prevention. Inside and outside housekeeping is imperative for fire prevention. Providing sufficient clear space free from flammable and combustible material and flammable substances limits fires from spreading. Proper housekeeping will provide room for the fire department to maneuver when fighting a fire.
3. It is Scott Builders, Inc.'s policy to control accumulations of flammable and combustible waste material and residues so that they do not contribute to a fire emergency. Employees are responsible to keep the job-site and their immediate work area free of clutter, debris, and other items that compromise the purpose of this program.
4. Physical separation of flammable and combustible materials from ignition sources by non-combustible or fire resistant construction or by a distance of at least twenty (20) feet is required.
5. When performing "Hot Work", a fire extinguisher must be within reach of the workers and in some cases a fire watch must be used. A "Hot Work" Permit must be filled out and filed on site.
6. Know the location of the fire extinguishers in your area and how to use them. Follow the **PASS** System. **P**ull the pin – **A**im at the base of fire – **S**queeze handle – **S**weep.
7. All "NO SMOKING" signs and areas are to be obeyed.
8. Gasoline is to be used as a motor fuel only.
9. All on-site refueling tanks must be set up on a solid, level and non-combustible surface. They must be properly marked to their contents, protected from accidental collision and must have at least a 5BC fire extinguisher in the vicinity. A "Flammable" or "Combustible" and a "No Smoking" sticker must also be adhered to the tank.

WELDING AND BURNING

1. Always clear area below cutting or welding operations so that you do not drop slag on hoses, cables or workers.
2. Use only manual electrode holders specifically designed for arc welding.
3. Use leak-proof welding helmets and burning goggles for eye protection and to prevent flash burns. Always wear eye protection to guard against slag while chipping, grinding and dressing of welds.
4. Make sure that all parts subject to electrical current are fully insulated against the maximum voltage encountered to ground.
5. A ground return cable must have a safe current carrying capacity equal to, or exceeding, the specified maximum output capacity of the arc-welding unit that it services.

6. Place cables, leads and connections so that there is no fire or tripping hazards.
7. Shield all arc welding and cutting operations with noncombustible or flameproof screens wherever practical.
8. Keep suitable fire extinguisher readily available when welding, cutting or heating on the job.
9. Be sure that proper ventilation is provided whenever welding and / or cutting is performed in a confined space or in a non-ventilated area.
10. A “Hot Work Permit” must be filled out and maintained.

COMPRESSED GAS CYLINDERS

1. All gas cylinders must have their contents clearly marked on the outside of each cylinder.
2. Cylinders must be placed on a stable surface and secured in an upright position, including storage and transfer.
3. All leaking or defective cylinders must be removed from service promptly, tagged as inoperable and placed in an open space removed from the work area.
4. All operators are required to inspect equipment prior to utilization. Oxygen and gas cylinders placed in storage are to be kept 20 feet apart or have a ½ hour fire barrier at least 5’ high between them.
5. Full and empty cylinders are to be stored separately and protected from excess heat, snow, ice or physical damage.

ELECTRICAL

1. When running temporary power on a construction site, a Ground Fault Circuit Interrupter (GFCI) must be used. **Note:** An extension cord turns permanent wiring of a building into temporary power. Therefore it is best and safest work practice to always include a GFCI into any electrical circuit for worker protection.
2. Always inspect all electrical equipment on a regular basis and have a qualified person repair the damaged equipment or properly discard of it.
3. Watch out for surrounding powerlines and ones that are adjacent to the roof and/or are connected to the building. Always stay at least ten (10) feet away from live powerlines.
4. Use only molded heavy-duty construction grade electrical equipment!
5. Use only round 3-wire insulated extension cords (14 gauge or larger). The flat Romex type extension cords are prohibited.

6. Do not repair extension cords unless the repair meets the initial specifications of the cord (i.e. water proof, extreme temperatures etc.).
7. Do not run extension cords through wall, ceiling, window and/or door openings unless the cord is protected from any type of damage.
8. Task lighting must be sufficient for the task at hand and lights must be guarded.

HAND AND POWER TOOLS

Employees who use hand and power tools and who are exposed to the hazards of falling, flying, abrasive and splashing objects, or exposed to harmful dusts, fumes, mists, vapors, or gases must be provided with the proper personal protective equipment necessary to protect them from the hazard. Remember that powder-actuated tool operators are required to be trained and certified. All hazards involved in the use of power tools can be prevented by following five basic safety rules:

1. Keep all tools in good condition with regular maintenance.
2. Use the right tool for the job.
3. Examine each tool for damage before use.
4. Operate according to the manufacturer's instructions.
5. Provide and use the proper protective equipment.

MOTORIZED, MECHANIZED AND EARTHMOVING EQUIPMENT

1. All operators must be fully trained and authorized before running any kind of equipment. Documentation of training and authorization shall be maintained on the site.
2. The operator must inspect all machinery and equipment prior to each shift, and during use to make sure it is in safe operating condition. Any issues must be immediately reported to a supervisor. The inspection shall include the braking system, all controls, steering, lighting, tires or tracks and any fluid levels. If found to be in disrepair the equipment must be properly Locked and Tagged Out of service.
3. All operators must secure the seat belt before starting the machine and keep it fastened during operation to prevent them from falling out in case of a tip-over or rollover.
4. If equipment is left unattended, it must be properly parked with the power shut off, the controls in neutral, the parking break set and all attachments lowered to the ground. The equipment must be parked in a safe area.

5. All equipment left unattended at night adjacent to highways or construction areas must have lights, reflectors, and/or barricades to identify location of the equipment.
6. All fuel-powered equipment must be equipped with a well-maintained 5BC rated fire extinguisher.
7. Rated load capacities and recommended rules of operation must be conspicuously posted on all equipment at the operator's station and must always be obeyed. The operator must use the machine in the manner that the manufacturer intended and for which it was designed.
8. All slow-moving vehicles entering public roadways must have an orange triangle attached to the back, which identifies them as slow-moving vehicles.
9. If equipment is parked or left unattended in an area where the chance of a rollaway can occur, the wheels must be properly blocked.
10. On-site re-fueling tanks must be marked to their contents, set up on a firm and non-combustible surface and must be protected from accidental collision. A 5BC rated fire extinguisher must be close-by. During fueling the operator must shut off the engine before filling, make sure the machine is not occupied and make sure positive contact is made between the re-fueling tank and the machine tank. This will eliminate static discharge. The operator must observe the immediate surrounding area for open flame or sparks and must not smoke during the refueling operation.
11. Only the operator is allowed to be on the machine while in operation. At no time are other riders allowed unless they can sit in a manufacturer equipped seat.
12. All equipment must be equipped with a functional back-up alarm that can be clearly heard over all other background noise on the site.
13. The operator must wear ANSI Z87 approved eye protection while operating the machine if the machine does not have an enclosed cab.
14. All loads must be centered and secured to prevent movement or beyond the manufacturers load limits according to the posted load chart on the machine.

FORKLIFT (POWERED INDUSTRIAL TRUCK) SAFETY

1. Only trained and certified operators must operate Scott Builders, Inc's forklifts. All training and certification must be forklift type and operation specific.
2. The forklift must be inspected before use by the operator and not be used if the inspection process reveals deficiencies that could make the forklift unsafe to operate.

3. Forklifts must only be operated in the safest manner possible. Adjust driving habits and speeds to the surroundings and the terrain and watch for bystanders and pedestrians.
4. Load charts, decals and indicators must be clearly legible from the operator seat.
5. If a forklift is left unattended, it must be properly parked with the power shut off, the controls in neutral, the parking break set and all attachments lowered to the ground. The forklift must be parked in a safe area.
6. All operators must wear a seat belt during operation if the forklift is equipped with one. If the forklift's seat belt is damaged or removed, the forklift cannot be used until seat belt is either repaired or replaced.
7. All forklifts must be equipped with a well-maintained 5BC rated fire extinguisher.
8. Forklift Attached Man Baskets
 - All forklifts used to hoist personnel, must be de-rated to one third (33.3%) of their rated capacity. (I.e. a forklift with the capacity of 6,000 lbs has only a maximum capacity of 2,000 lbs when personnel are lifted. Included in the 2,000 lbs is the weight of the man basket, the load / equipment and the personnel.) Especially forklifts lifting personnel must NEVER be overloaded!
 - Only manufactured and/or approved man baskets must be used to elevate personnel. The man basket must be rated and stamped with its capacity and weight.
 - The man basket must NEVER be overloaded and all personnel involved in the operation must be trained in the hazards and safe operating procedures.
 - The basket must be secured to the mast and a guardrail system must be up on all four (4) sides. Note: If the basket is within 14 inches of the face of the work, the railing facing the structure may be taken down for the duration of the work.
 - The man basket must not extend more than ten (10) inches beyond the wheelbase of the forklift on either side. The depth of the basket must not exceed 2 times the load center of gravity. This is to prevent tipping of the platform.
 - All personnel inside a forklift-attached man basket must be tied-off utilizing a personal fall restraint or arrest system.
 - While the man basket is elevated and workers are inside, a certified forklift operator must be in the seat at all times and the forklift must NOT be moved. Only up and down motion of the mast/basket is allowed.
 - On inclines it must be assured that the wheels are blocked to prevent the forklift from rolling off.
 - A man basket must NEVER be end-loaded!

MOTOR VEHICLES

1. Only authorized employees are allowed to operate company owned vehicles for work related activities. Any other use of a company vehicle must be pre-authorized by the president of the company.
2. Authorized employees must not operate a company owned motor vehicle while under the influence of alcohol, illegal drugs or over the counter prescription medication that might impair the drivers' abilities to safely operate the vehicle.
3. All employees operating a Company vehicle or using their personal vehicle for Company business are required to wear a Seat Belt. This applies to all passengers as well.
4. All Scott Builders, Inc. employees operating a Motor Vehicle for company purpose must supply a copy of their current drivers' license. This copy must also be maintained on site and in the main office.
5. Use of cell phones and other electronic devices while operating a vehicle for company purpose is discouraged unless a "Hands Free" system is used. In some states it is a moving violation to text or talk on a cell phone while moving in a motor vehicle. Any activity that causes distraction for the driver such as eating while driving or adjusting radio volumes and stations is not permitted. Drivers must obey all posted traffic control signs and devices. All drivers must maintain a minimum safe following distances between their vehicle and any other vehicle.
6. All company vehicles must only be used for the purpose intended by the manufacturer and maintained in safe working order per the manufacturers' recommendations. All loads shall be secured within the manufactures' specifications and DOT requirements.
7. All traffic accidents and violations that occur while operating a company vehicle must be reported immediately to Scott Builders office. All incidents must be documented. The employees' authorization to operate a company vehicle will be rescinded until a review of the incident has been performed by Scott Builders management.

BARRICADES AND HOLE COVERS

1. Excavations and openings in working surfaces must be protected with barricades or hole covers.
2. Barricades and/or signs must always be provided as warning of hazards such as overhead work, crane swing, man lift work and excavations.
3. When a hole or floor opening (2 inches in diameter or more) is created during the performance of a work activity, a cover or barricade must be installed immediately. Any hole cover must be capable of supporting at least twice the anticipated load, must be secured from movement and marked in bright fluorescent color.

CRANES

1. Starting February 09, 2011, any crane and/or derrick operator engaging in construction activities in Minnesota must be in possession of a valid crane-operator certificate (CCO). The certificate must be issued by a nationally recognized and accredited certification program.
2. All cranes must be inspected daily by the designated operator and annually by a competent person, or by a government or private agency recognized by the U.S. Department of Labor. Records of all inspections must be kept on-site.
3. All cranes must be set up on solid and level ground to prevent tip-over. Adequate dunnage must be used to assure a safe set-up.
4. Adequate clearance must be maintained between moving and rotating structures of the crane and fixed objects to allow the passage of employees without harm. Also, if two or more cranes are set up, provisions must be taken to prevent accidental collision.
5. Any lift exceeding 75% of the crane's rated load chart capacity is considered a critical lift and must be properly planned and documented.
6. Both the crane operator and the qualified signal person must be in agreement on what communication methods are used during the lift. Hand signals to crane and derrick operators should be those prescribed by the applicable American National Standard Institute (ANSI) standard for the type of crane in use. An illustration of the signals must be posted at the job site. All workers involved in the signaling process must be qualified and knowledgeable in the signs and/or equipment being used. Discrepancies must be addressed prior to the lift in a pre-lift meeting.
7. Rated load capacities, and recommended operating speeds, special hazard warnings, or instruction, must be conspicuously posted on all equipment. Instructions or warnings must be visible to the operator while he/she is at the control station.
8. Never allow loads, booms or rigging to approach within 20 feet of energized electrical lines rated 50 kV or lower unless the lines are de-energized and grounded. For lines rated greater than 50 kV, add .4 inches of clearance for every additional 1kV. Lines carrying 1,000 kV or more, a minimum of a 50 foot clearance must be guaranteed.
9. A person must be designated to observe clearance of the equipment and give timely warning for all operations where it is difficult for the operator to maintain the desired clearance by visual means. This applies but is not limited to structures, other equipment and/or powerlines.

RIGGING

1. Good rigging is essential for moving construction materials and equipment and, at the same time, keeping them under control.
2. All rigging operations require a qualified rigger whenever loads are hoisted by a crane or derrick and/or other workers are in the fall zone.
3. All rigging equipment must be inspected prior to use each day by a competent person, further, rigging should be inspected throughout the day for damage occurring during all day operation.
4. All alloyed chains must be inspected periodically but at least every 12 months. All inspection records must be kept on file and ready for review.
5. Never remove the load capacity tag of the equipment. Rigging equipment must be taken out of service if it can not be determined on-site what the capacity of the equipment is.
6. Do not overload any part of your rigging. Assure that the rigging will be of sufficient capacity to handle intended load. Check loads just off the ground for stability before hoisting.
7. Never leave a suspended load unattended and always use a tagline.
8. No workers are allowed in the fall zone and must never stand underneath a suspended load.

FALL PROTECTION

1. All workers exposed to a fall to a lower level of six (6) feet or more (four (4) feet or more on General Industry sites) must be protected from falling by a guardrail system, personal fall restraint/arrest system or a safety net system.
2. Workers exposed to fall hazards must be properly trained on recognizing and eliminating fall hazard conditions. Workers must further be trained on the proper installation or usage of the required fall protection means.
3. For more specific requirements, please refer to Scott Builders, Inc.'s Fall Protection Program.

STAIRWAYS and LADDERS

1. A break in elevation of 19" or more requires safe means of egress such as a step, stairs, ramp or a properly positioned ladder.
2. Stairways rising with at least 4 risers or 30" in vertical height, whichever is less; require a stair rail system on the unprotected side of the stairway with a handrail on the protected side of the stairway.
3. Use the right ladder for the job and use a ladder only for what it is designed for.
4. All ladders used must be inspected before use, well-maintained and heavy duty rated.
5. When setting up a ladder make sure it is well protected from accidental collision with pedestrians, vehicular or equipment traffic and swinging doors.
6. Access/Extension Ladders:
 - Must extend at least 3 feet above landing.
 - Must be secured on top and bottom.
 - At least a 3-foot area on top and bottom must be free from slipping and tripping hazards.
 - Must be pitched in 4:1 ratio.
 - Must not be set up within 6 feet of the rake or the edge of the roof.
 - One person climbing up and/or down at a time.
 - Use the 3-point rule for ascending or descending.
 - When working off an extension ladder, do not overreach and use stabilizers or rubber pads to prevent ladder from sliding.
7. Stepladders:
 - Must be unfolded and brackets locked in.
 - Set up on solid and level ground.
 - Very top and last rung are NO STEPS.
 - Do not sit on top of stepladder.
 - Do not straddle stepladder.
 - Do not climb or stand on the braces.
 - Do not leave tools unattended on top of a stepladder.
 - Do not lean stepladder against wall.

SCAFFOLDING

1. A Qualified Person must design all scaffolds.

2. Scaffolds must be erected, moved, dismantled, or altered only under the supervision and direction of a competent person qualified in scaffold erection, moving, dismantling or alteration. Only experienced and trained employees selected for such work by the competent person must perform such activities.
3. A competent person must be on-site to determine the feasibility and safety of providing fall protection for workers erecting or dismantling supported scaffolds. Proper fall protection is required for workers erecting or dismantling supported scaffolds where the installation and use of such protection is feasible and does not create a greater hazard.
4. The competent person must inspect the scaffold prior to shift. It is recommended to use a tagging system (green, yellow, red) indicating if the scaffold is ready to be used or not.
5. The competent person must train all users in safe use of the scaffold.
6. All workers on and around scaffolding must wear hard hats.
7. For more specific requirements, please refer to Scott Builders, Inc.'s Scaffold Safety Program.

MAN LIFTS (Aerial Lifts)

1. Employees operating any type of man lift must be properly trained and authorized in the safe use and operation of the equipment.
2. All man lifts must be operated within manufacturer's specifications and cannot be used outside their design.
3. All man lifts must be inspected prior to each use and cannot be operated if the inspection criteria are not met.
4. All mobile man lifts must be operated on solid and level surfaces to prevent a possible tip-over.
5. All stationary man lifts can only be operated on a solid and level surface and with all outriggers fully deployed.
6. When moving/driving a man lift, the operator must check all clearances, must watch for pedestrians and make sure that the travel path is free of any obstacles, overhead hazards, floor openings and/or electrical cords.
7. During operation, Employees inside the man lift must keep both feet on the platform at all times.

8. To protect Employees from falling out of the man lift, the complete guardrail system must be maintained and entry/exit openings must be closed as soon as an Employee enters the lift.
9. In addition to the complete guardrail system, Employees inside an articulating or extendable boom man lift must also be properly tied-off utilizing a fall restraint system.
10. To keep pedestrians and other Employees out of harms way, the area below and around the man lift must be properly marked.

TRENCHING AND EXCAVATION

1. The estimated location of utility installations, such as sewer, telephone, fuel, electric, water lines, or any other underground installations that reasonably may be expected to be encountered during excavation work, must be determined prior to opening an excavation.
2. All excavations require a competent person to perform soil testing to determine what type of protective system is needed to protect workers inside the excavation from a possible cave-in. Excavations less than 5 feet in depth do not require a protective system if an examination of the ground by a competent person provides no indication of a potential cave-in.
3. If no soil testing was performed prior to sending workers into the excavation, a type C soil must be assumed and therefore the excavation must either be sloped in a 1 ½ : 1 ratio, properly shielded or shored. Remember, type C soil can not be benched.
4. If workers have to work inside the excavation, a daily inspection of the excavation, the adjacent areas, and protective systems must be made by the competent person on-site to identify and eliminate potentials for a cave-in or other hazardous conditions. An inspection must be conducted by the competent person prior to the start of work and as needed throughout the day. Inspections must also be made after every rainstorm or other hazard increasing occurrences.
5. Workers entering an excavation must be trained in the potential hazards involved.
6. Excavations 4' in depth or more require safe means of egress in form of a ramp or a ladder no more than 25 feet away from the worker.
7. Workers inside an excavation must wear hard hats at all times.
8. No workers are allowed in excavations in which there is accumulated water, or in excavations in which water is accumulating, unless adequate precautions have been taken to protect workers against the hazards posed by water accumulation.
9. Workers must be protected from the spoil pile and/or other materials or equipment that could pose a hazard by falling or rolling into the excavation. Protection must be provided

by placing and keeping such materials or equipment at least 2 feet from the excavation edge.

10. A registered engineer must design the protective systems for excavations greater than 20 feet in depth.
11. **NOTE:** On specific sites, trenches greater than four (4) feet in depth are also considered confined spaces due to potential exposure to hazardous substances such as Hydrogen Sulfide.
12. For more specific requirements, please refer to Scott Builders, Inc.'s Trenching and Excavation Safety Program.

CONFINED SPACE ENTRY

1. Any worker that has to work in a Confined Space must be properly trained on his/her duties and the hazards involved.
2. "Confined space" is defined as a space large enough for an employee to enter and so configured that assigned work can be performed but has limited or restricted means for entry or exit and is not made for continuous occupancy.
3. "Confined space entry" means that any part of the worker's body is breaking the plane of any opening of the confined space, and includes any ensuing work activities inside the confined space.
4. A permit is required when any of the following characteristics is met:
 - Dangerous air contamination including oxygen deficiency or oxygen enrichment
 - Engulfment or asphyxiation hazard
 - Any other recognized serious safety or health hazard
5. Employees entering a permit required confined space must be properly trained and educated on the hazards and risks involved. Training must include:
 - Entry permit requirements
 - Air monitoring
 - Entrant procedures
 - Attendant procedures
 - Rescue procedures
6. If the local emergency department is chosen to be called in case of a confined space emergency, arrangements must be made with the local emergency department prior to anybody entering the permit required confined space to assure appropriate response time and confined space rescue capabilities.
7. For more specific requirements, please refer to Scott Builders, Inc.'s Confined Space Safety Program.

EQUIPMENT REPAIRS

1. Only qualified personnel must perform any form of repairs to Scott Builders, Inc.'s tools, equipment and machineries.
2. Only approved solvents are to be used in cleaning parts. The use of gasoline for cleaning is prohibited.
3. When it becomes necessary for you to work beneath a suspended machine or part of suspended machine, it must be safely blocked or cribbed.
4. Proper Personal Protective Equipment must be worn by all mechanics according to Scott Builders, Inc.'s Personal Protective Equipment Program.
5. Be sure all equipment and vehicles are locked out, the key out of the ignition, and controls tagged indicating to others that you are working on the machine.
6. All mobile equipment must have the wheels blocked before any work can be performed underneath and/or around the equipment.

SHORT SERVICE EMPLOYEES

1. Statistics show that workers injury rates are higher the first 6 months they are on the job therefore, any employee with less than 6 months working for Scott Builders, Inc. will be considered a Short Service Employee (SSE). The Owner Client must be notified that an SSE will be on their site, prior to arriving on site.
2. Any short service employee will be clearly identifiable from other employees on the site but use of different colored hard hats or a square shaped decal on the back of the hard hat. Once the SSE demonstrates competency and compliance with the Safety Program the identifying hard hat or label may be removed or changed.
3. In an effort to educate new workers about site specific hazards and their control measures, the first three days after a new worker's arrival on a specific job site, Scott Builders, Inc. will require that worker to work directly with another experienced worker who is already familiar with the specific site hazards. This policy addresses ALL workers, regardless of how long they have been employed by Scott Builders, Inc.
4. If at any time a Scott Builders, Inc. employee is found exhibiting a lack of knowledge of a site specific hazard, the Immediate Supervisor must retrain the worker and reassign them with an experienced worker who is knowledgeable of the site hazards and their control measures until the new worker shows complete understanding.
5. This policy must be followed by all sub-contractors of Scott Builders as well.

STOP WORK AUTHORITY

- A. All Scott Builder employees and sub-contractor employees have the authority and obligation to stop work whenever an unsafe condition or incident occurs. Stop work authority is also expected when the work task is not clearly understood.
- B. Once work is stopped under this policy no work will proceed until all issues and/or concerns are addressed.
- C. All employees are required to attend training on the Stop Work Authority policy before initial assignment. This training must be documented. This includes all sub-contractor employees.
- D. In the event an employee issues a stop work directive the employee shall be protected by Scott Builders management from intimidation or retribution for exercising their right to stop unsafe work or activities.
- E. All stop work activity will be documented along with any corrective measures. This documentation will be reviewed by Scott Builders management to determine compliance with the policy.
- F. Stop Work Authority Responsibilities:
 - a. **Superintendent:**
 - i. Encourages all employees and sub-contractor to participate in the Stop Work Authority process.
 - ii. Responds immediately to any concern raised by employees and sub-contractors.
 - iii. Ensures any corrective actions are documented and completed before allowing work to resume.
 - iv. Immediately disciplines any worker shown to be harassing or intimidating the stop work issuing individual.
 - b. **Employees**
 - i. Stops work immediately when an unsafe condition exists and notifies the immediate supervisor. Assists supervisor in completing documentation of issue.
 - ii. Participates in any investigation to establish corrective action.
 - iii. Reports to Superintendent and harassment or intimidation perceived.

G. Stop Work Process:

- a. When an unsafe condition is identified the Stop Work process will be started and coordinated through the Scott Builders Superintendent.
- b. All stop work process will be initiated in a positive manner.
- c. All affected workers will be notified of the stop work order along with all supervision of those affected personnel.
- d. Once the investigation is completed a corrective measure will be developed. The corrective measure must be communicated to all affected workers before work can resume.
- e. Once it is safe to resume work Scott Builders superintendent will notify all parties involved.

H. Follow-up:

- a. Once a stop work incident is completed and documented, a review of the process must be performed by Scott Builders to ensure that all issues have been corrected properly.
- b. Most issues can be resolved on the job site without further investigation. Once completed it is important to follow-up to make sure all employees clearly understand why and how the issue was resolved.

WORKING ALONE

1. It is Scott Builders policy that employees are not allowed to work alone at any time. It is also strongly recommended that sub-contractor employees follow this same policy.
2. If a case where an employee must work alone a hazard assessment will be performed to evaluate the risk of working alone and control measures.
3. If an employee is required to work alone some form of communication will be established so the worker is monitored at all times on a routine and regular basis as predetermined by the hazard assessment. Communication can be telephone, radio or physical observation.
4. The Superintendent is responsible for establishing contact on a regular basis with the employee working alone. If telephone and or radio are the established communication process, physical observation will be the back-up process in the event either of the previous processes fails. All communication or observation will be documented.
5. In the event the worker does not respond to direct attempts for communication by phone or check in at the scheduled time intervals the Superintendent will immediately proceed to the last known work area. If a sub-contractor employee fails to respond, the supervisor will immediately check on their employee and make a written report to Scott Builders on what happened and corrective measure.

Scott Builders, Inc.

SUBCONTRACTOR MANAGEMENT PLAN

I. Scope

Scott Builders, Inc. requires that all sub-contractors bidding on work for Scott Builders, Inc. job sites pre-qualify their Environmental, Safety and Health program through an electronic verification system. The current systems recognized are PEC Premier or ISNetworld. The sub-contractors must have a passing score and include documentation of those scores as part of the bidding package. Any sub-contractor failing to produce a passing score through one of the above listed processes will not have their bids considered for use. It is the responsibility of each sub-contractor to have and follow a pre-qualified safety program along with compliance with all Scott Builders, Inc.'s and site specific safety requirements.

II. Purpose

Job site safety is all contractors' responsibility. To ensure that all sub-contractors perform their work in the safest possible manner, an active safety program that addresses all potential hazards on the job-site and how to protect their employees, visitors, other trades workers and the site Host employees from those hazards is of utmost importance. By pre-qualifying through one of the processes above, any voids in a sub-contractors written safety program can be addressed and updated prior to arriving on site.

III. Process

- a. All sub-contractors will be notified in writing in the specifications of the bid request that they must have their safety programs pre-qualified through PEC Premier or ISNetworld. Bids will not be accepted by Scott Builders, Inc. without the sub-contractor including the passing scores with their bid package.
- b. Once received, the EHS Officer will review the scores for compliance with the site specific or Host Contractor requirements. The EHS Officer will request from the sub-contractor a listing of safety training dates, topics, list of attendees and any certifications required, (CCO, Forklift Operator, Scaffold Competent Person, Trenching Competent Person, etc.) Once reviewed, a report and any possible recommendations will be made to the President of Scott Builders on whether or not a sub-contractor meets the minimum requirements set forth by the site specifics and Scott Builders.
- c. A Pre-job safety meeting will be held with all sub-contractors project management and field supervision meeting the minimum requirements, prior to arriving on site, to discuss site specific issues, site requirements and Scott Builders expectations. This meeting will be documented.
- d. All sub-contractors employees and field management assigned to a Scott Builders job-site will be required to attend a pre-job safety orientation prior to arriving on the

- job-site. This orientation will be led by Scott Builders EHS Officer and will be documented.
- e. All sub-contractors are required to complete a Job Safety Analysis/Job Hazard Analysis (JSA/JHA) daily for each crew. The employees will be monitored throughout the day for compliance with the JSA/JHA. If changes occur in the process or condition, the sub-contractor must reevaluate the JSA/JHA for any changes needed.
 - f. All sub-contractors are required to attend any tailgate safety meetings held by Scott Builders or the Host Company.
 - g. A representative from each sub-contractor will participate in a twice weekly site safety compliance inspection with the Scott Builders EHS Officer or Superintendent. These safety compliance inspections may become more frequent as new sub-contractors are added to the site. All safety inspections will be documented showing positive observations and/or any issues noted. Possible corrective actions and completion dates will be discussed and delegated to the appropriate sub-contractor. Once corrective actions are completed, the sub-contractor must give Scott Builders a document showing the issue, correction date, method of correction and name of person performing corrective action.

IV. POST JOB REVIEW

Once a job has been completed Scott Builders will review each sub-contractors safety performance on the job site, both positive and negative. This information will be maintained and used as a basis for considering future requests to that sub-contractor for a bid. This review will be performed by the EHS Officer and Site Superintendent with input from the President of Scott Builders. Once completed, the review will be shared with the sub-contractor to facilitate improvement for future work with Scott Builders, Inc.

Scott Builders, Inc.

SUBCONTRACTOR SAFETY PROGRAM REQUIREMENTS

Scott Builders, Inc. requires each Subcontractor to establish and make available at each job site the following information:

1. A written Safety Health & Loss Prevention Program (AWAIR Program in Minnesota) describing the steps to reduce accident and injuries.

- Clearly stated goals
- Objectives for meeting those goals

2. Assigned Responsibilities

- Who is the competent person on-site
- Who is the responsible person for company safety
- Who is the company contact for any key decisions
- What are the responsibilities of personnel in the company (Superintendent, Supervisor, Foreman, Worker, etc.)

3. Identifying, analyzing and controlling hazards

- Who is the competent person on-site
- How will they identify and control hazards
- What are the hazards specific to the trade
- What are the anticipated hazards of the site

4. Training/Communication

- Documentation that all employees have been trained on hazards specific to the trade
- Documentation that all employees have been trained on site-specific hazards
- Documentation that all temporary labor has been trained on hazards of the trade and site-specific hazards of the trade and job site
- A schedule for tool-box safety meetings
- How will employees report unsafe conditions
- How will employees report accidents

5. Accident Investigation

- Who will investigate accidents
- Where are the Accident Investigation and First Report of Injury forms kept
- List of important phone numbers
- What is the address and phone number where the OSHA 300 log is kept and who is the contact person during normal hours
- Method to inform Scott Builders, Inc.'s Site Superintendent.

6. Enforcement

- What are your safety rules and regulations
- What is your discipline system for failure to follow safety rules
- Who is responsible for enforcing your safety rules on-site

7. MN Employee Right-To-Know (Hazard Communication)

- A written program must be provided
- A copy of the Safety Data Sheets of all chemicals and hazardous substances brought on-site

This information will be provided in a 3 ring binder and divided/tabbed into the categories noted above. These books will be maintained in Scott Builders, Inc.'s site office while your company is on-site. The **SHLPP Program** is to be updated and/or revised upon change at least once a year.

NOTE: If a Scott Builders, Inc.'s Subcontractor hires or brings on-site any lower-tier Subcontractors, the lower-tier Subcontractors must abide by the exact same rules and regulations as the hiring Subcontractor. No exceptions made!

Scott Builders, Inc.

Additional Subcontractor Requirements

All employees of all subcontractors and suppliers will adhere to the following:

- OSHA rules & regulations will be a minimum standard.
- Gloves are to be worn at all times by everyone on site.
- Hard toed boots are required 100% of the time by everyone on the site.
- T-shirts with short sleeves (minimum) will be worn at all times.
- No foul or obscene language or gestures on clothing.
- Hard hats will be worn at all times by everyone on site.
- Safety glasses/goggles are required 100% of the time (must have side shields)
- All lunch garbage will be disposed of properly every day.
- Guardrails will be installed on all scaffolds including bakers.
- No harassing of pedestrian traffic on, or passing the site.
- GFI cords will be used at all times.
- Parking in approved areas only.
- Scott Builders personnel (Supt./P.M.) decisions will govern on safety issues.
- No use of tools from other subs is allowed without written permission from each sub.
- Clean up is the responsibility of each subcontractor.
- No overtime unless authorized by job superintendent. If overtime is approved, there must be at least 2 personnel with a cell phone onsite at all times.
- All equipment must have guards & alarms in place and operational at all times.
- Each subcontractor will hold safety meetings weekly. A record of who attended and the items of discussion will be turned in to Scott Builders superintendent within 2 working days each week.
- If subcontractor and/or general contractor is fined by OSHA for subcontractors failure to adhere to regulations and rules, subcontractor will be responsible for all costs incurred by general contractor attributable to such fines, including but not limited to, the fine, including accelerations, legal fees, etc.
- All subcontractors/supplier personnel will be subject to and agree to take any and all drug/alcohol testing that Scott Builders or our clients order. This must be adhered to immediately upon request and paid by the subcontractors. All subcontractors must provide proof of employee drug testing within the last six months.
- No weapons of any type are allowed in vehicles or any persons will on project site.
- Some clients will demand vehicle searches. All subcontractors/supplier employees must allow said search at time and point of demand. Any and all contraband (drug, alcohol, weapons) will be seized with no guarantee of return. Illegal substances will be turned over to the lawful authority for further actions.
- Every subcontractors employees must have OSHA 10 training & H2S certification.
- Every subcontractor's employees must attend mandatory orientation meeting prior to starting any work.
- No smoking allowed on site 100% of the time.
- A minimum of one person with each subcontractor **MUST** be certified in CPR & First Aid.

Failure to adhere to these policies will be grounds for ejection from our sites for personnel and subcontractors that do not comply.

Signature (Sub-contractor Rep)
Date _____

Company

Scott Builders, Inc.

SUBCONTRACTOR FALL PROTECTION PROGRAM REQUIREMENTS

Scott Builders, Inc. requires each Subcontractor whose employees are exposed to fall hazards of 6 feet or more (4 feet or more on General Industry sites) to establish and make available at each job site the following information:

A written program including the following:

1. **Methods to identify** potential fall hazards that occur on the site (open sided floors, leading (roof) edges, doorways, balconies, stairways, window openings, floor holes, floor openings, excavations, etc.).
2. **Methods of determination** as to what Fall Protection System is the most efficient for the job depending on the work area to be protected, number of employees to be protected and the type of work being performed.

- A. Guard rails.
- B. Personal fall arrest/restraint systems.
- C. Safety nets.
- D. Warning line system.
- E. Controlled access zone.
- F. Monitor system.
- G. Hole Covers.
- H. Slide Guards.
- I. Fall Protection Plan.

3. Required Documentation

- A. How and why Fall Protection System(s) is/are selected.
- B. The proper installation of the selected Fall Protection System(s).
- C. Possible limitations of the selected Fall Protection System(s).
- D. Who is responsible to maintain the Fall Protection System(s)?
- E. All affected employees must be properly trained on the selected Fall Protection System(s) prior to being exposed to the identified fall hazards.
- F. Training must be updated for ANY changes that occur during the course of construction.
- G. All documentation must be submitted to the Superintendent prior to employees being exposed to the identified fall hazards. After review and approval of the submitted documentation, the Superintendent will then give the okay to start the work. All records will be maintained on site for the duration of the job.

4. Responsibilities

A. Subcontractor / Owner.

- i. Ensures that the proper Fall Protection System(s) is/are selected and that all necessary equipment is provided on the job site.
- ii. Ensures that all affected employees are properly trained on the Fall Protection System(s) used.

B. Crew Foreman.

- i. Ensures that all the proper equipment needed is provided, used and well maintained on the job site.
- ii. Ensures that selected Fall Protection System(s) is/are properly installed and/or implemented.
- iii. Ensures that all affected employees are properly trained on the selected Fall Protection System(s) used.
- iv. Monitors the activity and enforces all applicable safety rules.

C. Affected Employee.

- i. Knows the Fall Protection System(s) used.
- ii. Installs and uses the Fall Protection System(s) according to his/her training.
- iii. Reports all hazards, unsafe conditions, faulty equipment and incidents that occur.

D. Competent person.

- i. Provides training for all affected employees on selected Fall Protection System(s).
- ii. Inspects Fall Protection System(s) and equipment used at least daily.
- iii. Identifies hazards and takes immediate corrective action.
- iv. Monitors the activity and enforces all applicable safety rules.

This information will be provided in a 3 ring binder and divided/tabbed into the categories noted above. These books will be maintained in Scott Builders, Inc.'s site office while your company is on-site.

NOTE: If a Scott Builders, Inc.'s Subcontractor hires or brings on-site any lower-tier Subcontractors, the lower-tier Subcontractors must abide by the exact same rules and regulations as the hiring Subcontractor. No exceptions made!

The OSHA standards allow certain construction activities to vary from the 6' fall exposure limit including but not limited to Steel Erection, Pre-cast Concrete Erection, Roofing, etc. Site specific requirements shall supersede any OSHA minimum requirements for fall protection provided the site specific requirements afford the same or better hazard protection as the OSHA Standards.

Scott Builders, Inc.

New Employee Loss Prevention Orientation

Print Employee Name:	Date: / /
Print Person Doing Orientation:	Time: : a.m. / p.m.

√ Indicate a "check mark" on items discussed

SITE TOUR

- Superintendent will tour the job-site with the new hire to acquaint the employee with the operations, location of first aid kit and fire extinguishers, and the site specific emergency evacuation procedures and requirements.

GENERAL SAFETY

- Provide and review Scott Builders, Inc.'s' Safety, Health & Loss Prevention Program and Policy (AWAIR Program), Employee Rules and Procedures and explain basic safety rules and regulations in place.
- Explain the role and purpose of the "**Safety and Health Loss Prevention Team**" and how to give suggestions to them.
- Reporting of Accidents/Near Miss Hazard Notification Form: Explain who to report accidents, and purpose of the Near Miss Hazard Notification Program.
- General Safety Rules as outlined in provided MN AWAIR (SHLPP) Program.
- MN Employee Right-To-Know Program (Hazard Communication) high points.
- General Housekeeping expectations on the job-site.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

- Hard hats are required at all times.
- Safety glasses are required at all times.
- Ear plugs and other hearing protection are to be worn in designated areas.
- Additional equipment, such as dust masks and gloves will be assigned if needed.
- Type of clothing to be worn at the job i.e. long pants, shirts that cover the shoulders, work boots and **no** loose clothing, **no** jewelry, etc.
- PPE handed out to employee: _____

HEAT & COLD STRESS

- Explain hazards of Heat & Cold Stress and emphasize the importance of adequate hydration not only in the summer, but also in the winter. Remind employee to dress in layers and wear proper clothing in the winter.

REPORTING PROCEDURES

- All injuries are to be reported to the Superintendent. A First Report of Injury may be filed. Accidents will be investigated by the Superintendent and the employee will be required to fill out an Employee Accident Report.
- Employee must inform the Superintendent of observed work habits or physical working conditions that may produce injury, product and property damage.
- Report all "Near Misses" to Superintendent who will fill out and file a "Near Miss Notification Form" with the office.

SAFETY SIGNS/PLACARDS/DECALS

- Make employee aware of all signs and postings on the site and on equipment. Explain that they are to be followed at all times.

LIFTING

- Covered the fundamentals of lifting: bend knees, hold object close to body, clear path, etc.

RETURN-TO-WORK

- Review Return to Work Policy and Program.

QUESTIONS

- Encourage employee to ask questions, now and at any time in the future.

ADDITIONAL COMMENTS:

I have been instructed in the fundamentals of safety in my job performance at Scott Builders, Inc. I understand that Scott Builders, Inc. is committed to a safe and healthy workplace. I will do my part to be a safe and responsible worker, ask questions when I don't understand a procedure, and **NEVER** risk my own or someone else's safety in order to get the job done.

Employee Signature	Date / /
--------------------	------------------

Signature of Person Doing Orientation	Date / /
---------------------------------------	------------------

Scott Builders, Inc.

New Employee Loss Prevention Orientation Guide

SITE TOUR

- Superintendent will tour the job site to acquaint the employee with the operations, location of first aid kit and fire extinguishers, and the site specific emergency evacuation procedures and any other specific site hazards.

GENERAL SAFETY

- Hand out a copy of the AWAIR Program (Employee Version) and tell the New Hire that you will review the Company specific rules during this Orientation Process.
- The "**Safety and Health Loss Prevention Team**" (Safety Committee) is a team of field and office employees reviewing incidents and other safety concerns and making suggestions to improve Scott Builders, Inc.'s overall safety. Scott Builders, Inc. encourages everybody in the Company to contribute to the Safety Team in any shape or form, whether they are on the team or not.
- All incidents (accidents and near misses = almost accident) must be immediately reported to the Superintendent to avoid later confusion about the incident and possible work comp coverage. It is very important to report every incident, including near misses, to eliminate future losses.
- Show employee the section of the General Safety Rules in the provided AWAIR Program and ask him/her to read through the program when he/she has time.
- MN Employee Right-To-Know Program high points are:
 - Do not work with a hazardous substance without prior reviewing the Safety Data Sheet (SDS)
 - On an SDS you find everything you need to know about the product and SDS folders are provided on every job-site.
 - If in doubt, stop the task and ask your Superintendent!
- General Housekeeping expectations at the work station are to pick up after yourself and do everything it takes to avoid slipping and tripping hazards. Even if you didn't create the hazard, try to eliminate it to protect yourself and your fellow co-workers.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

- Hard hats are required at all times on most construction sites. They must be inspected and cleaned on a regular basis.
- Safety glasses are required at all times on most construction sites. In extreme exposures a face shield may also be required in addition to the safety glasses.
- Ear plugs and other hearing protection are to be worn in designated areas. As a rule of thumb, when you can't hear the person next to you talking in a normal voice, it's too loud and hearing protection must be worn. Ask your Superintendent for adequate hearing protection and how to properly insert it.
- Additional equipment, such as dust masks and gloves will be assigned to you by the Superintendent. When required additional training may be required before use. It is important to review SDSs to see what PPE is needed.
- Long pants and shirts that cover the shoulders must be worn at all times. Loose clothing and jewelry that might get caught in machinery or maybe poses an electrocution hazard is not allowed. Solid ankle high work boots must be worn. Steel toes are recommended and encouraged and required on specific job sites.
- PPE handed out to employee: ___list PPE here___ _____

HEAT & COLD STRESS

- To prevent Heat Stress in hot environments (not necessarily only in the summer, could be indoors in a hot place), plenty of fluids, frequent breaks and air movement are crucial.
- To prevent Cold Stress in cold environments (not necessarily only when it's below freezing), layers of clothing, frequent warming up and staying dry are crucial.
- In both situations, good nutrition, adequate hydration and the Buddy System (work with a partner) are strongly encouraged.

REPORTING PROCEDURES

- All injuries are to be reported to the Superintendent immediately. A First Report of Injury may be filed. Accidents will be investigated by the Superintendent and the employee (if available) will be required to fill out an Employee Accident Report. All accident investigations shall be in writing.
- Employee must inform the Superintendent of observed work habits or physical working conditions that may produce injury, product and property damage.
- Report all "Near Misses" to Superintendent who will fill out and file a "Near Miss Notification Form" with the office. Management will review all those reports and will take action to prevent an actual accident from happening in the future.

SAFETY SIGNS/PLACARDS/DECALS

- Explain to employee that all signs and postings on the site and on equipment are to be followed at all times.

LIFTING

- Bend your knees, keep chin up, that'll keep your back straight. Avoid twisting motions and never reach out too high or too far with a load. If it's too heavy or too bulky, ask for help and/or use any mechanical device that is available to you to perform the lift.

RETURN-TO-WORK

- If an employee is on restrictive duty due to a work related injury, Scott Builders, Inc. will work actively with the injured employee to get him/her back to work within his/her restrictions.

QUESTIONS

- Encourage employee to ask questions, now and at any time in the future.

ADDITIONAL COMMENTS:

Scott Builders, Inc.

ENVIRONMENTAL POLICY

Scott Builders is committed to managing environmental matters as an integral part of our business. In particular, it is our policy to assure the integrity of our processes and job sites at all times and at all places. We will do so by adhering to the following principles:

Compliance

We will comply with all applicable laws and regulations and will implement programs and procedures to assure compliance. Strict compliance with standards will be a key ingredient in the training, performance reviews and incentives of all employees. Where existing laws and regulations are not adequate to assure protection of human health, safety and the environment, we will establish and meet our own quality standards.

Prevention

We will employ management systems and procedures specifically designed to prevent activities and / or conditions that pose a threat to human health, safety or the environment. We will minimize risk and protect our employees and the communities in which we operate by employing safe technologies and operating procedures, as well as being prepared for emergencies.

1. We will store all flammable, combustible and/or hazardous materials in approved containers on site and away from inclement weather to prevent stormwater contamination.
2. We will evaluate our usage of chemicals on site and limit amounts of those chemicals stored on site to ensure excess materials are avoided.
3. All original shipping container labels must be maintained legible.
4. All containers of flammable, combustible or hazardous materials shall be secured at the end of the work day to prevent potential unattended spills or leaks. This storage will be clean and organized with all containers properly labeled. If necessary a secondary containment system will be developed to prevent ground contamination.
5. Any equipment found to be leaking shall be removed from the construction activity and immediately repaired.
6. Any spills or leaks that occur where the product comes in contact with the soil must be cleaned immediately. Any affected soils shall be collected and disposed of properly.
7. We will supply containment materials or spill kits to control release potential. Considerations on size and type of materials for cleanup will be evaluated and additions to these kits will be made based on need. This will be immediately available for use by our sub-contractors.
8. All employees responsible for use of the containment or spill response will be properly trained on where the equipment is stored, how to use the kits, proper waste disposal, types of PPE required for the clean-up activity and how to document the clean-up activity. All spills will be reported immediately to the Scott Builders Superintendent.

Communication

We will communicate our commitment to quality to our employees. We will provide employee training and clean up materials for spills. We will communicate to our sub-contractors the requirement for compliance with the Scott Builders, Inc. policy. Any spills noted will be documented and investigated by the Scott Builders Superintendent. In the event of a spill meeting the Reportable Quantity (RQ) criteria outlined by the EPA, the Superintendent will call the National Response Center Duty Officer at 1-800-424-8802 and file a report of the spill. The information needed will include:

- Your name, location, organization, and telephone number
- Name and address of the party responsible for the incident
- Date and time of the incident
- Location of the incident
- Source and cause of the release or spill
- Types of material(s) released or spilled
- Quantity of materials released or spilled
- Medium (e.g. land, water) affected by release or spill
- Danger or threat posed by the release or spill
- Number and types of injuries or fatalities (if any)
- Weather conditions at the incident location
- Whether an evacuation has occurred
- Other agencies notified or about to be notified
- Any other information that may help emergency personnel respond to the incident

Continuous Improvement / Goals

We will continuously seek opportunities to improve our adherence to these principles. Our goal is to strive for Environmental Excellence and Compliance. We will periodically report progress to our stakeholders. We will continue to review and explore for opportunities to use renewable products, recyclable material, and other environmentally friendly products and programs.

Rick Scott, President: _____ **Date:** ____ / ____ / ____

Scott Builders, Inc.

HARASSMENT POLICY

Scott Builders, Inc. is committed to providing a work environment free from all forms of unlawful discrimination and conduct which can be considered harassing, coercive or intimidating, including sexual harassment and unlawful harassment based on race, sex, age, religion, national origin, marital status, sexual orientation, disability or other protected classes. All such forms of unlawful conduct by any employee, vendor, suppliers, subcontractors, customers or clients are contrary to company policy and the company's values and will not be tolerated.

I. Prohibited Conduct

For the purposes of this policy, prohibited conduct includes verbal, visual or physical conduct that relates to another person's sex, race, national origin, religion, marital status, disability, age, sexual orientation or other protected class status, where such conduct may have the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

Prohibited conduct may include, among other things, sexually or racially offensive graffiti, telling racist or sexist jokes or making offensive or derogatory remarks about another person's race, sex, age, religion, national origin, sexual orientation, marital status or disability. Prohibited conduct includes, among other things, sexual harassment as defined below.

Prohibited conduct may occur not only through personal contact, comments, visual displays, or observation, but also through exposure to media such as e-mail, display of internet sites or other material or information on computer monitors; radio or television or other broadcasts containing sexually explicit, vulgar, profane or otherwise offensive language.

II. Harassment

Sexual harassment is defined as unwelcome advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when;

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; or
2. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
3. Such conduct has the purposes or effect of unreasonably interfering with an individual's work performance or creating an intimidating, offensive or hostile working environment.

Sexually harassing conduct may include but is not limited to use of sexual innuendo, suggestive comments, insults, threats, jokes about gender-specific traits, or sexual propositions, unwanted flirtation or invitations for dates or other social activities, suggestive or insulting noises, leering, whistling or obscene gestures, touching, pinching, brushing the body, displaying in the workplace sexually suggestive objects, publications or pictures.

Sexually harassing conduct may include conduct between persons of the same gender.

Racial harassment and harassment based on religion, marital status, age, sex, sexual orientation, disability or national origin or other protected classes includes unwelcome, hostile or discriminatory behavior or remarks directed at individuals due to their membership in these groups. Any comments or behavior that create a hostile or intimidating working environment for an individual based on their membership in a protected class, and any actions which adversely impact an individual's employment conditions or advancement because of their membership in a protected class will not be tolerated.

III. VIOLENCE

Violence on the job site is not allowed and will not be tolerated in any form including physical contact, threatened physical contact and/or abuse, verbal abuse and gestures.

Any employee found to have engaged in a threatening manner, involved in physical and/or verbal abuse towards another employee or the public shall be immediately discharged and removed from the job-site.

IV. Persons Covered

Unlawful discrimination and harassment is prohibited whether committed by managers, supervisors, crew members, or non-employees, including vendors, suppliers, subcontractors, independent contractors or clients.

V. Complaint Procedure

Employees who become aware of or are subject to harassment and discrimination are strongly encouraged to immediately notify Rick Scott at 763-684-0000. Reports of discrimination or harassment will be kept confidential to the extent possible, consistent with the need for a thorough investigation.

VI. Discipline

Any employee found to have engaged in discrimination, harassment or other prohibited conduct, in violation of the stated policy, will be subject to appropriate discipline, up to and including termination.

Scott Builders, Inc.

WASTE MANAGEMENT POLICY

Scott Builders is committed to controlling waste generated on our job sites. Recycling and reuse of materials have long been associated with wise construction practices. Utilizing reuse and salvage methods on site reduce the need for new materials, reduces materials that end up in the landfill, creates a cleaner and safer project site, and improves community relations.

Compliance

We will comply with all applicable laws and regulations and will implement programs and procedures to assure compliance. Strict compliance with standards will be a key ingredient in the training, performance reviews and incentives of all employees. Where existing laws and regulations are not adequate to assure protection of human health, safety and the environment, we will establish and meet our own quality standards.

Prevention

We will employ management systems and procedures specifically designed to reduce construction waste. We will minimize amounts of waste generated by employing the following procedures:

- We will provide containment for non-recyclable waste.
- We will provide a separate area for containing recyclables.
- We will provide a method for separating reusable materials.
- Prior to starting a job Scott Builders will estimate how much waste will be generated on the job site based on previous job site history. Typically all Scott Builder job sites produce approximately the same amounts and types of waste.
- We will purchase to prevent waste by only having on site the materials known to be required for the operation. By doing this there is less likelihood of damage to occur to stored materials thus creating additional waste.
- We will strive to reduce releases to the atmosphere, land or water. We will minimize the amount and toxicity of waste generated and will ensure the safe treatment and disposal of waste. All containers must be covered to control run-off.

Communication

We will communicate our commitment to the control and reduction of waste and how to achieve these objectives to our employees through training and vendors by informing them of controls set in place on the job sites.

Continuous Improvement / Goals

We will continuously seek opportunities to improve our adherence to these principles. Our goal is to strive for Environmental Excellence and Compliance. We will continue to review and explore for opportunities to use renewable products, recyclable material, and other environmentally friendly products and programs.

Rick Scott, President: _____

Date: ___ / ___ / ___

Scott Builders, Inc.

Responsibilities

A. President

1. Has overall responsibility for reviewing, enforcing and approving the Safety, Health and Loss Prevention Program policy and direction.
2. Annually attends a Safety Team (Committee) Meeting.
3. Approves Safety, Health and Loss Prevention Program budget.

B. EHS Officer

1. Provides guidance to President on policies.
2. Semi-annually reviews the status of the Program with projected goals. This can be done by:
 - a) Every six month reviews trend summarized reports on all lost-time accidents that have occurred within the last two years.
 - b) Analyzes workers' compensation claim cost reports on injuries, and estimated direct and indirect loss due to accidents.
 - c) Reviews the quarterly summarized audit reports for recurring patterns of loss potentials, corrective action taken and pending abatement issues.
 - d) Reviews status of employee training
3. Provides summary of Safety, Health and Loss Prevention Program activities on an annual basis.
4. Enforces the Company's Safety, Health and Loss Prevention Program for personnel.
5. Provides the necessary regulatory training/documentation for employees.
6. Records required accident investigations and certification of employee safety trainings.
7. Investigates all serious accidents with the Superintendent.
8. Helps monitor activities for the Superintendent.
9. Chairs the Company's Safety Team meetings.

D. Superintendent

1. Understand the purpose of the Company's Safety, Health and Loss Prevention Program
2. Communicates the Program to all employees on a regular basis.
3. Recommends program changes to the EHS Officer on updating safety/health and environmental regulatory standard changes, work procedure changes, etc.
4. Enforces the company's Safety, Health and Loss Prevention Program through company's disciplinary process. This would include positive observations, discipline, etc.
5. Submits accident reports involving personal injury and product/property damage above \$200 to the EHS Officer. Documents the causes and submits a written summary report on the accident upon request. Reviews the employee's submitted accident report for clarification or additional comments.
6. Works with employees and the Company's Safety Team in correcting identified hazards. When a hazard cannot be eliminated immediately or completely, identifies alternate means of minimizing loss until a more permanent repair/fix is established.
7. Responsible to identify accident potentials.
8. Responsible for accident and employee safety training.
9. Periodically reviews job-site and work areas for physical hazards, improper work habits, and Standard Operating Procedures that can cause personal injury, property or equipment damage.
10. Ensures Safety Team members attend meetings.
11. Monitors compliance and effectiveness of job site orientation for *newly hired employees* and existing employees. Effectiveness can be measured by observing equipment operation, employee work habits, training records, accidents and equipment abuse.
12. Implements Company's Return-to-Work Program in cooperation with the claims coordinator.
13. Identifies accident trends, costs, and common factors with the EHS Officer. Cooperates with the EHS Officer when performing an overall analysis on incurred losses.
14. Identifies budgetary items needed in the Safety, Health and Loss Prevention Program, including machine and equipment repairs and alterations, and compliance with current safety and health regulations.
15. Ensures that first aid treatment medical kits are available. Ensures through annual training that all employees will be informed of procedures for responding to major medical emergencies.

16. When practical, attends all employee Safety, Health and Loss Prevention Program meetings.
17. Recommends annual Safety, Health and Loss Prevention Program objectives to the EHS Officer and President.
19. Places all required “OSHA Workplace Posters” in a prominent location for employees to review.
20. Maintains training records and reports, etc.

E. Employee

1. Understands the Safety, Health and Loss Prevention Program. Cooperates with the implementation of the Company’s Safety, Health and Loss Prevention Program.
2. Follows all of the Company’s Safety Rules.
3. Walks through his/her designated work area and observes for situations/conditions that contribute to work related injury, property or equipment damage. Notifies the Superintendent if a situation is observed that may cause a loss.
4. Suggests to the Superintendent needs for equipment maintenance repair and required materials.
5. Suggests annual Loss Prevention objectives to the Superintendent or the EHS Officer.
6. Follows Standard Operating Procedures. Makes suggestions to the Superintendent for procedural change to lower risk factors causing injury and property loss.
7. Reports hazards observed on the job to the Superintendent or the EHS Officer.
8. Performs job tasks as trained.
9. Exercises care to prevent injury to other employees and to one's self. When in doubt, contact Immediate Supervisor for proper instructions.
10. Gives whole-hearted support to the Safety, Health and Loss Prevention Program. Identifies risk factors that can cause loss to fellow employees, equipment, and property, reporting them to the Superintendent or to the Safety Team Representative.
11. Attends required employee Skill/Safety trainings as provided by Company.
12. Addresses hazards identified by the Company’s Safety Team members and employees. Responds with corrective actions for hazards identified by the EHS Officer and/or Superintendent during random, on-site walk through.

13. Cooperates with the Company's Safety Team on regulatory safety/health topics, back injury prevention, and other ergonomic issues. Cooperates with all levels of management and all employees to identify pertinent Safety Team meeting topics.

14. Workers' Compensation Program

- a) Immediately reports all accidents and occupational diseases to the Immediate Supervisor. Cooperates in filling out a First Report of Injury and any additional documentation necessary.
- b) Cooperates with the Company's Return-to-Work Program.

15. Accident Investigation

- a) For all personal injuries with lost time in excess of one hour, completes an Employee Accident Investigation Report. For all serious accidents, contacts the Immediate Supervisor immediately.
- b) Cooperates on investigation of all property damage in excess of \$200.
- c) Documents all near misses that may have likely resulted in a lost time, work related injury or product/property damage.

Scott Builders, Inc.

Safety Team Roles and Responsibilities

Scott Builders, Inc. recognizes that is more than the mere mechanics of the job while performing assigned work. The Company has established a Safety and Health Team to address hazardous conditions recognized in the workplace by all employees. Team members will become increasing aware of the significance of the appointment when attending meetings or making an area audit. The Safety Team member holds a position of trust. The Company trusts each member to observe how the Company's safety policy and programs are being carried out on the job, advises if the policy needs to revamped, and finally observes safety related conditions and acts by employees while performing their job.

The Superintendent depends on Team members to let them know about unsafe conditions and practices from day-to-day.

Employees trust the Team members by suggesting recommended safeguards and to warn of identified hazards seen in the work place.

Responsibilities

1. Establish procedures for handling safety related suggestions, reports of hazards and recommendations by Company personnel.
2. Review and make recommendations on Company's Safety and Health objectives, and policies.
3. Review accidents and near misses for the purpose of recommending methods to prevent recurrence.
4. Conduct and reviews inspection reports on work areas and equipment conducted periodically through the year.
5. Establish safety topics for training.
6. Promote safety and health programs for all employees.
7. Report serious unsafe conditions or practices to the Site Superintendent.
8. Assist in distribution of accident prevention material.
9. Assist the Site Superintendent in attaining an accident free job-site.
10. Evaluate accident and illness prevention methods, hazards noted during inspections, and other pertinent subjects.

Hazard Identification/Assessment

I. HAZARD IDENTIFICATION OVERVIEW

Hazard identification focuses on preventing loss from occurring. Hazard identification identifies physical hazards, work practices and other loss potentials that are likely to cause personal injury, property and/or equipment damage; so that corrective action can be taken before a loss occurs. The hazard identification process should be used for routine and non-routine activities as well as new processes, changes in operation, products or services as applicable. The following methods list areas which can be used to identify loss potentials.

A. Job Hazard Analysis

Job Hazard Analysis (JHA) is a proactive method to review the workplace and the task at hand to identify hazards before they occur and to minimize hazardous conditions and improper acts. A functional JHA can be achieved in the following manner:

1. Employ an individual who can perform JHA.
2. Keep current on newly identified hazards in your industry and apply corrective actions as needed for your workplace.
3. Assign and train a group of employees to review each highly hazardous job from time-to-time. The group will be taking a fresh step-by-step approach to detecting hidden hazards.
4. Request feedback from employees and/or Sub-Contractors on items that appear harmful. Involve all workers exposed to the hazard in the hazard identification process and the protective measures to be taken to ensure a proper understanding and compliance to control or eliminate the hazard potential.
5. Discuss and review existing hazards and hazard controls.
6. Use accident and near-miss investigation reports to analyze what caused the incident, and review standard operating procedures for possible change.
7. To perform a JHA, you would ask:
 - a. What can go wrong?
 - b. What are the consequences?
 - c. How could it happen?

- d. What are other contributing factors?
- e. How likely is it that the hazard will occur?

B. Standard Operating Procedures (SOP)

1. Standard operating procedures maintain consistency in how a job is done by employees. All the factors that "produce" the items have to occur in a sequence of steps. These steps should be examined for hazards to make sure appropriate methods that control the hazards are in place. All hazardous jobs are to have written standard operating procedures. This outline will be used for employee orientation and training.
2. Standard operating procedures can change due to many factors, such as hazard identification, discovering more efficient ways of doing the job, the purchase of new equipment, etc. Employees are encouraged to recommend other SOPs other than "the established way of doing things," to develop a better way to perform the task.

C. Job-Site Inspection Checklist

1. The inspection checklist is a reminder of items that should be looked at or looked for. A checklist can be extensive depending on the complexity of the operation. Hazardous or critical areas and tasks should be reviewed continually. Other situations or conditions may be reviewed monthly or quarterly.
2. The advantage of a checklist is that it is a proactive method to identify factors that are known to cause loss. Another benefit is ease of documentation and analysis in detecting trends. Reviewing checklists from past inspections helps identify problems that are reoccurring. If a hazardous condition continues or reappears, management control is either lacking or not being emphasized adequately. Management's method of control must be reviewed to clarify responsibilities, or added to an individual's role in controlling loss. See the appendix for checklists.

D. Accident Investigation

1. Accidents are investigated to determine their cause and to prevent them from happening again. An accident is a failure within a system or a collision of subsystems requiring a correction, if possible.
2. Ideally, JHA will identify hidden hazards. Even so, accidents may eventually occur resulting in personal injury or property loss.
3. Accident investigation is to be used to analyze the processes that are currently in place to determine the causes of the loss. This may mean that the actual work area on the job site will have to be changed, and/or the standard operating procedures altered to establish a stable work system. If the standard operating procedures need to be

altered, this will initiate new employee orientation, SOPs and the operational training checklist on this piece of equipment.

E. Maintenance

1. Another means to reduce hazard is preventative maintenance procedures for equipment and machinery. All equipment and machinery must be maintained as recommended by the manufacturer or industry standards. Document equipment or machinery maintenance. If equipment or machinery is not maintained properly, chances of equipment failure increases.

REMEMBER: Always document all efforts in hazard identification!

II. JOB HAZARD ANALYSIS AND CONTROL

The Company will identify and analyze hazards in the workplace by utilizing many different approaches. The people involved in this process will be all levels of Management, Employees, OECS, Inc. Associates and Insurance Representatives and Sub-Contractors. The aforementioned personnel must be knowledgeable in OSHA rules and regulations and capable of identifying general unsafe conditions and/or acts. Other areas the inspectors must be familiar with are those conditions and acts that cause accidents. This is accomplished by being in the business for many years and the knowledge of how accidents occur. Reviewing accident investigations from previous years will aid us in determining how people are hurt and how losses occur. These conditions and acts can then be searched out and eliminated during the inspections. As was stated before, there are many types of inspections: pre-construction review inspections; daily (on-site) inspections; formal (on-site) inspections. All of these inspections have many different levels which will be described as follows:

Pre-Construction Review Inspection:

The pre-construction review is held in the company's main office or other designated location before the actual on-site construction starts. The President, EHS Officer, and Superintendent should all be in attendance to ensure all levels of safety. A complete review of the plans and scheduled activities must be performed to identify all possible hazards and problem areas. All hazard situations must then be analyzed and ways must be found on how to best approach these situations to guarantee an accident free work-site. This pre-planning in the office is a very important step in controlling overall site safety.

Daily On-Site Inspections:

As part of a daily routine, the Superintendent will always be alert to unsafe conditions and acts. When reviewing the day's work routine with the employee, the Superintendent will point out the conditions the employee may encounter. Daily reminders are part of the daily routine, as well as teaching OSHA safety standards, and avoiding unsafe acts. The main person responsible for the daily on-site inspections is the Superintendent; but the added cooperation and input concerning safety and that of their co-workers, is the field employees.

It is an employee's responsibility to report to Management any unsafe or poor quality work practices being done by their fellow employees or any other construction trades working on the site.

Formal Inspections:

A. Job-Site Inspection:

1. The Superintendent will have a formal type of job-site inspection, either as a planned walkthrough or as part of the normal course of a the work day. When the job is inspected the Superintendent will make notes on the Job-Site Inspection Form on what safety problems are identified. This careful planning will reduce many possible accidents. Traffic patterns, crane movements, types of scaffolding etc., will also be reviewed to determine the potential safety problems. The Superintendent then will be able to formulate plans to avoid or work around these conditions. This safety inspection will give the Superintendent a period of concentration to discuss the hazards our employees work around daily, but at times take for granted. Also a review of all Tool Box Talks for unsafe conditions and acts will be discussed regarding the past month's topics.
2. All formal inspections and actions taken will be documented. Also notations in daily reports will be utilized. A copy of all daily reports, formal safety inspections, and Tool Box Talks will be maintained at the jobsite and after completion of the job at the main office.

B. Environmental Monitoring

1. When required or necessary, environmental monitoring (such as Carbon Monoxide testing) will be done on a daily or as needed basis by the Superintendent, which can most the times coincide with the daily walkthrough. The monitoring will also be included as part of all formal Job-Site Inspections. If elevated levels are noted, work will stop in the concerned area until measures are put in place to reduce the risk and/or exposure to the employees. An analysis will be made at that time to this correction of the concern; and, if deemed necessary, an environmental testing agency will be contacted to offer a professional opinion for correction of the situation. All necessary monitoring devices, on-site personnel inspections and professional direction will be used to provide the utmost safe working conditions.

C. Job Hazard Analysis and Control:

1. The Job Hazard Analysis Program will be used by the Superintendent and employees and Sub-Contractors to analyze the jobs they will perform. They will identify existing and potential hazards that are associated with each job and then establish controls for them. This will greatly help in detecting hazards before they can result in injury and/or damage.

2. The work site is continually analyzed to identify, record and control all hazards.
3. Safety precautions will be taught to the Superintendent prior to beginning of a job. Specific job hazards will be pointed out in connection with each phase of the job and instructions will be given on specific safe work practices that will help avoid these hazards. The Superintendent will be trained to understand the key role they play in job site safety, to enable them to carry out their safety and health responsibilities effectively. Training programs for the Superintendent will include the following:
 - Analyzing the work under their supervision to anticipate and identify potential hazards;
 - Maintaining physical protection in their work areas;
 - Reinforcing employee training on the nature of potential hazards in their work and on needed protective measures, through continual performance feedback and if necessary, through enforcement of safe work practices;
 - Understanding their safety and health responsibilities;
4. The Superintendent will be responsible for all Scott Builders, Inc. employees and Sub-Contractor employees to comply with all project environmental/pollution control requirements.
5. Job site walkthroughs are performed daily to detect and correct unsafe practices and conditions. These walkthroughs should focus on the identification and correction of potential safety, health and fire hazards. These walkthroughs are done by the Superintendent.
6. To be an effective part of this program the Superintendent must:
 - Identify work areas and tasks with a high risk of loss;
 - Set inspection responsibilities and schedules;
 - Develop an administrative system for review of reports;
 - Set up a procedure to follow-up remedial actions;
 - Analyze inspection findings while the Company is committed to providing a safe work place, we must never forget that it is the people who make the process work;
 - Ultimately people cause injuries and damages;
7. As part of an effective loss control program, Scott Builders, Inc.'s Management must:
 - Set program standards for observing employee's safe work practices;
 - Communicate program safety standards to all employees;
 - Monitor performances of employee's safe work practices;

E. Employee Training to Identify Hazards:

1. The best way to identify hazards is to talk to the employees themselves. Sometimes the employee will not actually recognize the hazard and may not appreciate the risk of injury or the danger taking place, but they will know the work they do and how they are doing it. We can access their knowledge by asking the right questions.
2. It is best to interview employees who have the most experience at that particular site or who has been working in their construction field a number of years. Their insights can be invaluable, not only in recognizing the hazard, but identifying feasible and acceptable means to control the hazards. Interviews will be conducted individually, in private or in groups of employees at safety meetings.
3. It is a good idea to video tape the hazard and record on an audio at the same time the description of each observation. Still photos are useful for documentation if they are numbered and the textual description of photos accompanies each accident. Employees should be told to jot down ideas that come to them and to talk to co-workers about their experiences and exposures.
4. Once a list of hazards has been collected, each hazard will be evaluated and prioritized in order of the most dangerous to determine which should be controlled first. As hazards are identified it will be found that some can be controlled immediately. Address these as soon as possible and don't wait until all processes are completed.
5. The goal is to provide the greatest amount of protection in the shortest amount of time. The employee will be trained in programs and procedures that will be designed to ensure that all employees understand and are aware of hazards to which they may be exposed and the proper methods for avoiding such hazards. If the employee notices conditions on the job that may appear hazardous, they must notify Management promptly if they are unable to control the hazard.
6. Once we identify the problem and their causes we can focus attention on eliminating them or reducing them. Where it is not feasible to eliminate such hazards they must be controlled to prevent unsafe and unhealthful exposure. Elimination or control will be accomplished in a timely manner. Once a hazard or a potential hazard is recognized, specifically as a part of the program, we will establish procedures to correct or control present or potential hazards in a timely manner. These procedures will include measures such as the following:
 - Using administrative and/or engineering controls where feasible and appropriate;
7. Establishing at the earliest time, safe work practices and procedures that are understood and followed by all employees. Understanding and compliance are a result of training, positive reinforcement correction of unsafe performance and if necessary, enforcement through a clearly communicated disciplinary system;

- Providing personal protective equipment when engineering controls are feasible and be sure employees know they need it; how to use it, and how to monitor it;
 - Provide regular equipment maintenance to prevent equipment breakdowns or failure;
 - Planning and preparing for emergencies and conducting training and emergency drills as needed to ensure that the proper responses to emergencies will be “second nature” for all personnel involved;
 - Establishing a medical program that includes first aid on-site, as well as nearby physician and emergency medical care to minimize or reduce the risk of worsening any injury or illness that occurs;
8. There will be ongoing training provided for all employees to ensure that everyone at the job site will know about the hazards that exist and how to control them.

III. HAZARD ASSESSMENT PROCESS

Hazard assessment evaluates probability and severity of the identified risk in order to determine where to initially invest resources.

A. Prioritizing Hazards

1. Each hazard represents a potential for occupational injury, property, or product damage. The purpose of identifying a hazard is to reduce the occurrence of a likely loss potential. Since some hazards have a greater likelihood of loss in terms of frequency and severity, a numeric code is assigned to hazards combining probability and severity of that risk.
2. These assessments of hazards are classified by using Risk Assessment Codes. (RAC). A Risk Assessment Chart is used combining both severity and the probability evaluation codes of a hazard by a standardized method. The Chart prioritizes the hazard ensuring a consistent evaluation. Within the Risk Assessment Chart the letters A, B, C, D reflect the probability of a mishap occurring. The far left vertical column Roman numerals, I, II, III, & IV reflect the severity of the hazard. Within the boxes are normal numbers 1-5 indicating the priority of the hazard. These numbers identify the abatement priority the company should address first.

Risk Assessment Chart

	Probability			
Severity	A	B	C	D
I	1	1	2	3
II	1	2	3	4
III	2	3	4	5
IV	3	4	5	5

B. Hazard Severity

Severity reflects the hazard assessment of the consequences if the accident occurs. It is a degree of an injury and occupational illness that could occur. The severity categories are as follows:

- I. Death or permanent total disability.
- II. Permanent partial disability, temporary total disability in excess of 3 months.
- III. Lost workday mishap.
- IV. First aid or minor medical treatment, or simply a violation of requirement in a standard. It is anticipated that many occupational deficiencies should fall into this category.

C. Hazard Probability

This is an assessment of the likelihood that a hazard deficiency will result in a mishap. They are to be coded in the following categories.

- A. Likely to occur immediately or within a short period of time.
- B. Probability will occur in time.
- C. Possibility to occur in time.
- D. Unlikely to occur

D. RAC Descriptions

1. Immediate danger
2. Serious
3. Moderate
4. Minor
5. Negligible

E. RAC Abatement

The lower the RAC number, the higher the priority should be placed on addressing the hazard. A RAC of 1 is more serious than a RAC of 2, Risk Assessment codes of 1, 2, & 3 are considered a concern and require an abatement date. They are to be addressed in a timely fashion.

RAC's 4 & 5 are low risk hazards and can be deferred until later where the company can schedule out to repair or replace the deficiency. RAC's 4 and 5 are to be checked periodically throughout the year, at least on a quarterly basis.

All RAC recommendations are to be monitored until complete. *Records of actions taken and all other documentation are to be on file for a minimum of 2 years after completion.*

F. Methods of Correction

1. The company will select a method of correcting the deficiencies that results in a recommendation. In terms of prioritizing ways of addressing the deficiency, the following are actions based on a priority of desired methods to correct the problem.
 - a. Provide administrative controls;
 - b. Substitutions of less hazardous materials or processes;
 - c. Provide engineering controls;
 - d. Isolation;
 - e. Procedures to work around the hazard;
 - f. Provide personal protection equipment;

2. When looking for corrections of loss potentials, the company should take the following areas into consideration.
 - a. Technical feasibility and cost;
 - b. The number of people exposed and length of time exposed;
 - c. Previous accident experience;
 - d. Future use of work area or equipment;
 - e. Available alternate methods to control the hazard or protect personnel;
 - f. Interim control measures in effect; Interim control measures' solutions can be used as temporary measures before more permanent solutions can be utilized;

Scott Builders, Inc.

Job-Site Inspection Report

Inspector's Name: _____ Job Name: _____ Date: ___ / ___ / ___

- | | |
|---|--|
| <p>1. Fall Hazards in general</p> <ul style="list-style-type: none"> a. Guardrails missing / incomplete / damaged / not adequate b. Hole Covers not in place / not marked / not secured / not adequate c. Warning Lines incomplete / not in place / not 6'/10'/15' from edge d. Controlled Access Zone not established e. Safety Monitor not present / not competent f. Personal Fall Arrest/Restraint System not being used g. Fall Protection Equipment damaged / not adequate h. Slide Guards not in place / not adequate i. Retrieval Plan not in place <p>2. Electrical Hazards in general</p> <ul style="list-style-type: none"> a. GFCI not used / not working b. Extension Cords frayed / taped / missing ground pin c. Power Tool damaged / cut cord / missing ground pin d. Non-Construction grade equipment being used e. Power panels, outlets, switches not guarded / damaged f. Temp lights missing guards/bulbs / open splices / not adequate <p>3. Personal Protective Equipment in general</p> <ul style="list-style-type: none"> a. Required PPE not worn / defective / not adequate <p>4. Stairways and Ladders in general</p> <ul style="list-style-type: none"> a. Handrails and/or stair rails missing b. Stair / step not provided when break in elevation of 19" or more c. Ladder set-up / misuse / damaged / not heavy duty <p>5. General Safety and Health</p> <ul style="list-style-type: none"> a. On-Site Sanitation not provided / not sanitary / not heated in winter b. Drinking water not provided (summer) / shelter not provided (winter) c. Safety Program, OSHA Posters, First Aid Kit missing / incomplete <p>6. Housekeeping in general</p> <ul style="list-style-type: none"> a. Slipping and Tripping hazards in main passageways/stairways b. Entries / Exits blocked c. Protruding nails / debris / lunch garbage on floor | <p>7. Scaffolding / Man Lifts / Man Baskets in general</p> <ul style="list-style-type: none"> a. Foundation not firm / level / mud sills / base plates b. Frame not plumb / rigid / braces missing c. Platform not fully decked / not level / no overhang d. Fall Protection over 10' not in place / guard rails e. Access not safe / no ladder frame / no ladder f. Scaffold components damaged / missing / not adequate g. Man basket not adequate / not secured / no fall protection / no driver h. Man lift damaged / missing fall protection (tie-off, mid rail chain) <p>8. Fire Hazards in general</p> <ul style="list-style-type: none"> a. Extinguishers missing / not inspected / not charged / hidden b. Flammables stored too close to ignition source c. Gas Cans are plastic / damaged d. LP Tanks not secured / stored in high traffic area / not properly set up e. On-site refueling tanks not protected / stickers missing / no fire ext. <p>9. Crane and Forklift in general</p> <ul style="list-style-type: none"> a. Crane outriggers not used / pads not used / area not secured b. Crane or rigging capacity exceeded / rigging material damaged c. Crane and/or forklift not inspected before shift / damaged d. Operator not certified / no seatbelt / unsafe behavior e. Overhead power lines closer than 20' <p>10. Trenching and Excavating in general</p> <ul style="list-style-type: none"> a. Protective System not used / damaged / not adequate b. Safe access missing / not adequate c. Equipment operation w/o seatbelt / missing back-up alarm <p>11. Other</p> <ul style="list-style-type: none"> a. _____ b. _____ c. _____ |
|---|--|

Item #	Hazard Description	Action Taken	Abatement Date
			___ / ___ / ___
			___ / ___ / ___
			___ / ___ / ___
			___ / ___ / ___
			___ / ___ / ___
			___ / ___ / ___
			___ / ___ / ___
			___ / ___ / ___

Scott Builders, Inc.

Employee Training

A. General

1. Employee safety training is another tool for an effective Safety, Health and Loss Prevention Program. While Scott Builders, Inc. believes in skills training, we also want to emphasize correct job procedure and training. All employees must discuss any problems or safety concerns with their Superintendent.
2. Training is an essential component of an effective Safety and Health Program. Training addresses the safety and health responsibilities of both management and employees. Training is often most effective when incorporated into performance requirements and job practices.
3. The purpose of training is to educate employees in all company processes, how to identify hazards, how to work safely and efficiently, how to minimize and eliminate loss potentials to avoid injuries, illnesses and keep Workers' Compensation cost down.
4. Scott Builders, Inc. will provide training which will be conducted at seminars and/or employee meetings.

B. Specific Training

1. Scott Builders, Inc.'s policy and state, local and federal law require that Scott Builders, Inc.'s staff provide safety and health training to employees. In addition, if appropriate, participating guests and visitors must receive safety and health briefing. The Superintendent is responsible for ensuring that employees under their supervision receive training to fully inform them about possible occupational health hazards and proper work procedure. Guests and visitors should be briefed and provided personal protective equipment before entering the construction project.
2. Employee training must include Scott Builders, Inc.'s Loss Prevention Orientation for new employees plus any additional training specific to the nature of hazards on the job. If needed, employees must complete the job specific training before they can work unsupervised. All new employees must attend the Company's Loss Prevention Orientation within the first month of employment.
3. OSHA and other federal regulations spell out several specific health and safety training requirements for special hazards. These include, but are not limited to, education for exposure to hazardous substances, fall protection hazards, personal protective equipment usage and certification in material handling equipment.

4. The Superintendent must identify potential training needs for the specific construction project and/or job task for which they are responsible.
5. Training, such as on-the-job training, is the responsibility of the Superintendent. This includes information on procedural changes or system modifications that impact safety. The Company provides several safety and health training courses, technical assistance on training needs, and resources to help the Superintendent fulfill their training responsibilities. Educational resources such as Tool Box Talks and other written materials will be given to employees throughout the year.
6. All on-the-job training must be documented and kept on-site for the duration of the job. The Superintendent must note the participants' names, topics discussed, instructors, and date. A copy of this information should be sent to the EHS Officer for inclusion in Scott Builders, Inc.'s training files.
7. All New Hires (an employee with less than 6 months with Scott Builders, Inc.) shall be identified from other workers by a different colored hard hat (color to be determined) or a square shaped sticker (color to be determined) on the back of the hard hat. Since injuries and accidents occur typically within the first 6 months on the job, New Hires will be required to work directly with an experienced worker for no less than the first three days on each jobsite. Thereafter they will be closely monitored by the Superintendent to ensure the New Hire clearly understands the hazards of the particular job they are performing and the needed corrective and preventative measures to be taken.

C. Safety Training

1. Safety education of all employees will be conducted through all phases of the work performed by Scott Builders, Inc. The Superintendent is responsible for the prevention of accidents for work under his/her direction and will be responsible for thorough accident prevention and safety training as well as instruction of the employees they supervise.
2. The Superintendent is also responsible for ensuring that all job site employees comply with all applicable training provisions of OSHA regulations. Training records will be kept up to date and readily available for review during OSHA inspections.
3. The Company will provide training for the Superintendent in pertinent safety and health matters. This training will be done through safety trainings and meetings. The Superintendent then passes this knowledge on to the employees.

D. Objectives

1. Employee training is essential for an effective Safety, Health and Loss Prevention Program. Training provides hazard awareness and proper job "know-how," and raises employees' work consciousness, motivation, and creativeness.
2. Job task training is designed to achieve four objectives;
 - a. Provide job knowledge and skills necessary to work properly.
 - b. Increase hazard awareness and show the necessity of precautions to minimize hazards.
 - c. Foster favorable attitudes in proper work habits and in maintaining a recognized hazard free work environment.
 - d. Enhance the management/employee partnership to promote productive work habits.
3. Employee training must be continuous and involve a variety of training. The following are types of training;
 - a. New-employee/existing employee orientation.
 - b. Loss prevention orientation.
 - c. Pre-job instructions.
 - d. Initial job instructions.

E. Job Task Training

1. Training is one of the most important elements of any Safety, Health and Loss Prevention Program. Such training is designed to enable employees to learn their jobs properly, bring new ideas to the workplace, reinforce existing safety policies and put the Safety, Health and Loss Prevention Program into action.
2. Safety training is actually part of job task training; they are one in the same. Training will be accomplished for all new employees, when new procedures or processes are introduced to veteran employees, and where through inspections and audits, the analysis indicates that employees require refresher training.
3. The success of Scott Builders, Inc.'s Safety, Health and Loss Prevention Program depends on the actions of individual employees as well as a commitment by the Company.
4. The Superintendent will review the safe work procedures unique to that employee's job, and how these safe work procedures protect against risk and danger.
5. Each employee will learn when personal protective equipment is required or necessary, and how to use and maintain the equipment in good condition.

6. Each employee will learn what to do in case of workplace emergencies. The Superintendent is also vested with special duties concerning the safety of employees. The Superintendent is the key figure in the establishment and success of Scott Builders, Inc.'s Safety, Health and Loss Prevention Program. They have primary responsibility for actually implementing the Safety, Health and Loss Prevention Program, especially as it relates directly to the workplace. The Superintendent is responsible for being familiar with safety and health hazards to which employees are exposed, how to recognize them, the potential effects of these hazards, and rules and procedures for maintaining a safe job-site.
7. The Superintendent must convey this information to the employees at the job-site, and must investigate accidents according to the accident investigation policies contained in this manual.

F. Employee Responsibility for Training

1. Teaching safety is a two-way street. Scott Builders, Inc. can train and enforce safety, but only employees can practice safety. Safety cooperation requires employee participation.
2. Training will be provided prior to all work assignments, including training on specific hazards which might involve special personal protective equipment.
3. Throughout the year, employee training will be conducted. The employees will discuss the application of the Company's Safety, Health and Loss Prevention Program to actual job assignments. Remember, the following general safety rules apply in all situations:
 - a. No employee should undertake a job that appears to be unduly hazardous where personal injury may be likely to occur.
 - b. No employee is expected to undertake a job until receiving adequate job task instructions, and is authorized to perform the task.
 - c. No employee should use chemicals without fully understanding their toxic properties and without the knowledge required to work with these chemicals safely.
 - d. Mechanical safeguards must be kept in place.
 - e. Employees must report any unsafe conditions to the Superintendent and/or the EHS Officer.
 - f. Any work-related injury or illness must be reported to management at once.
 - g. Personal protective equipment must be used when and where required. All such equipment must be properly maintained.

ALL health and safety training must be documented. Documentation includes the participants' names and employee numbers, topics discussed, instructor(s), and date. The Company is responsible for maintaining training records for the duration of employment.

Scott Builders, Inc.

Accident Investigation

General Statement

Each employee has an individual responsibility to prevent accidents. It is to the benefit of all employees and Scott Builders, Inc. to report any situation or condition that may be believed to present a safety hazard, including any known or concealed dangers in the work area. Scott Builders, Inc. encourages all employees to report any areas of concern. The company will take immediate action to investigate the matter.

General Accident Investigation Process

Any incident that resulted in personal injury or product/property damage or could have likely resulted in personal injury or product/property damage requires an accident or a near miss investigation. It is the responsibility of the Superintendent to perform all Accident or Incident Investigations.

A. Accident Investigation

1. Accident investigation is an integral part of Loss Prevention Accident Investigation is an “after the fact” action. The purpose is to identify actual causes and recognize other potential causes leading to corrective action. Result is to eliminate or minimize the actual loss causes and loss potentials identified during the investigation process.
2. The Accident Investigation process should include:
 - a) The investigation phase. Establishment of the relevant accident facts and development of solutions to prevent reoccurrence.
 - b) The report phase. Completion of the required forms by the Superintendent and review of the investigation by the EHS Officer.
 - c) The follow-up phase. Implementation of the planned corrective actions and follow-up on planned corrective actions. Communication with employees in similar conditions about the findings and corrective actions.

B. Near Misses

“Near misses” are precursors to accidents. The policy of this Company is to investigate the causes of near misses that could produce an injury or product/property damage. The purpose is to identify situations leading to loss. Near misses will be investigated by the Superintendent and reviewed by the EHS Officer. The investigation results and corrective action taken should be summarized in the final report.

C. Sources of Accident Information

There are several methods for getting accident information. Normally, not all of the methods are necessary to get the complete story of any one accident. The five principal methods or sources of information are as follows:

1. **Interviewing the employee involved.** The employee who had the accident is the primary source of information. Unless there are special circumstances, an interview of the injured employee is usually sufficient for getting the accident facts when investigating the non-disabling injury accident. Where a serious injury index case a disabling injury, or major property damage accident is involved, the investigation should tap all available sources of information that are necessary to obtain a complete understanding of the accident.
2. **Interviewing witnesses to the accident.** For disabling or potentially disabling injury cases, available witnesses should always be interviewed for whatever they know concerning the accident and the contributing factors. No one witness may know the whole story. However, information from several witnesses may clarify what occurred, how it occurred and possibly why it occurred. Witnesses become a primary source of information when it is not possible to interview the injured employee because of the seriousness of injuries or emotional shock.
3. **Assessment of the accident scene.** Unless there are good reasons for not doing so, the employee involved should be interviewed at the scene of the accident. An assessment of the employee's relevant physical environment, such as machines, work area layout, illumination, tools that were in use, and other items that had some bearing on the accident, is often essential to completely understand the accident. An employee interview away from the accident site may not be sufficient. It is particularly important to assess the accident site when the injured employee cannot be interviewed. The object is to get some clues as to what might have occurred.
4. **Re-enactment of the accident.** Sometimes it is desirable to have the employee involved, or a witness if the former is not available, reenact the circumstances leading up to the accident in order to get a more precise picture of what took place. Re-enactment should only be attempted when other sources of information leave certain questions unanswered, particularly questions that have to do with the exact physical relationship between the employee involved and aspects of his environment. Precautions must be taken during re-enactment to avoid a repetition of the accident.
5. **Reconstruction of the accident.** When the employee involved cannot be interviewed and there are no witnesses, the only recourse is to reconstruct the accident by means of controlled imagination applied to all available clues at the scene of the accident. The use of technical or medical experts may be necessary to provide interpretations of what might have occurred. Obviously, this is not an investigative method that normally involves lower levels of supervision.

D. Accident Investigation Procedures

1. A primary tool used by Scott Builders, Inc. to identify the areas responsible for accidents is a thorough and properly completed accident investigation. The results of each investigation will be reduced to writing and submitted for review by Scott Builders, Inc.'s management, and, if the accident resulted in serious injury, to Company attorneys. If the accident resulted in serious injury, the procedure will be directed to the company's workers' compensation insurance carrier claims department to provide the most reliable method in preserving evidence. All investigations pursuant to the directions of the insurance company legal and claim department and the in-house legal counsel will be protected by all applicable privileges, if any. The attorney will provide more detail on this topic during the investigation.
2. All personnel involved in an Accident/Incident Investigation must be properly trained before being involved in the process on how to proceed and to identify any and all potential "Root Causes", possible corrective actions and how to perform a proper follow-up to verify worker understanding of the procedure required to prevent any possible reoccurrence.
3. A written report should be prepared from notes and diagrams made at the scene, or a portable Dictaphone will be used to record direct eyewitness statements as near to the actual time of observation as possible. Photographs must be taken from all angles to show what happened and condition at the time of the incident. All statements should include the time and date given, and the town or county where the statement was made. If the statement is intended to be used in court proceedings, a suitable jurat is required, otherwise, a simple statement that the description is sworn to be true under penalty of perjury with the date, place and time should be included. All pictures should be similarly identified. Let people know on tape that they are being recorded. Also, make sure that the names and addresses and day and evening phone number of all eye witnesses are noted or recorded.
4. If a formal police report or other official investigation is conducted by any government agency, get the name and badge number of the official, or a business card, and find out when a copy of the official report will be available to the public. If an employee is requested to make a statement, the employee has the right to have the Company lawyer attend the employees statement.
5. A satisfactory accident report will answer the following questions:
 - a) **What happened?** The investigation report should begin by describing the accident, the injury sustained, the eyewitnesses, the date, time and location of the incident and the date and time of the report. Remember: who, what, when, where and how are the questions that the report must answer.
 - b) **Why did it happen?** The ultimate cause of the accident may not be known for several days after all the data are analyzed. However, if an obvious cause suggests

itself, include the conclusion as a hypothesis at the time the statement is given to the person in charge of the investigation.

- c) **What can be done to prevent a reoccurrence?** Once a report determines the cause of the accident, it should suggest a method for avoiding future accidents of a similar character. Corrective action is a decision by Management. Once a solution has been adopted, it is everyone's responsibility to implement it.
- d) **What has been done?** A follow up report will be issued after a reasonable amount of time to determine if the suggested solution was implemented, and if so, whether the likelihood of an accident has been reduced.

E. Records

Scott Builders, Inc. maintains records of employee training, hazard identification and abatement, and accident investigation.

F. OSHA Records Required

Records of required accident investigations and certification of employee safety training should be recorded by the Claims Coordinator where the EHS Officer will retain custody of the records. A written report will be maintained on each accident, injury or on-the-job illness requiring medical treatment. A record of each such injury or illness is recorded on OSHA Log Form 300 and Summary of Work-Related Injuries and Illnesses Form 300A according to its instructions. Supplemental records of each injury are maintained on OSHA Form 301, or the First Report of Injury if the same information is present. Every year, a summary of all reported injuries or illnesses is posted no later than February 1, for three months, until April 30th, on OSHA Form 300A. These records are maintained for five years from the date of preparation.

G. Reporting

1. Scott Builders must complete an Incident Investigation report within 24 hours of the incident or accident.
2. **The Company is required to report work related incidents that result in the death of an employee within 8 hours and the inpatient hospitalization of an employee, any amputations or eye loss within 24 hours to OSHA. The report must be made orally to OSHA either via phone or in person. Voice message or written notification are not acceptable!**

During business hours: (8 a.m. to 4:30 p.m., Monday through Friday)

Call your local area MN OSHA office:

St. Paul

Phone: (651) 284-5050
Toll-free: 1-800-DIAL-DLI

1-800-342-5354

Duluth

Phone: (218) 733-7830

Mankato

Phone: (507) 389-6507

After business hours: (before 8 a.m. or after 4:30 p.m. or on Weekends and Holidays)

Call the federal OSHA 24-hour toll-free number:

1-800-321-OSHA

1-800-321-6742

The reports must include:

- the employer's name,
- the location and time of the incident,
- the number of employees involved,
- the name and phone number of a contact person,
- and a brief description of the incident.

Note: An incident that is not immediately reportable becomes a reportable incident if it results in the death of an employee within 30 days. Also, employers only have to report an inpatient hospitalization, amputation or loss of an eye that occurs within 24 hours of a work related incident.

In cases of hospitalization or death, a full investigation with copies to governmental authorities will be required. In less serious cases, the investigation report must be presented by the company for disclosure to its insurance carrier (First Report of Injury) and for remedial action at the work site (Occupational Injury/Illness Investigation Report).

Scott Builders, Inc.

EMPLOYEE'S REPORT OF INJURY

Note To Employee: This report must be completed by YOU as soon as possible after your injury. Read the questions carefully and make your answers complete and accurate!	
Name: _____	Job-site: _____
Job Title: _____	Supervisor: _____
Date of Injury: ____ / ____ / ____	Time of Injury: : a.m. / p.m. (circle one)
Did you notify your Immediate Supervisor of the injury? Yes <input type="checkbox"/> No <input type="checkbox"/> Date: __ / __ / __	
If you did not report the injury your Immediate Supervisor, please explain why! _____ _____	
Describe where the injury occurred (location)! _____ _____	
Describe in your own words what happened to cause the injury! _____ _____ _____	
What do you think can be done to prevent this from happening again in the future? _____ _____	
What is the nature of your injury, be specific, what body parts have been injured? _____ _____	
Who witnessed the accident? No witnesses <input type="checkbox"/>	
Name: _____	Phone: _____
Name: _____	Phone: _____
Additional Comments: _____ _____ _____	
Employee Signature: _____	Date: _____
Supervisor Signature: _____	Date: _____

Scott Builders, Inc. Supervisor Occupational Injury/Illness Investigation Report

1. Employees Last Name		First Name		MI.		2. Social Security Number	
3. Regular Occupation			4. Department		5. Occupation Worked When Injured		6. Injury Time (a.m./p.m.)
7. Job site/Facility			8. Department		9. Exact Location of accident (Illness)		
10. Type of Injury (Illness) and Body Part(s) Injured						11. Outcome Code	
12. Specific Job Being Done at Time of Accident (Ex: Hooking up of load, loading truck, changing cable, etc.)							
13. What occurred? Describe in sequence (1) Employee's location and position; (2) How he/she doing the task; (3) What occurred to trigger the accident; (4) The type of accident and contact agent, and, if necessary; (5) Give background information to help explain circumstances leading to the accident.							
						14. Contact Agent	
15. Check type of accident		<input type="checkbox"/> Struck by <input type="checkbox"/> Struck against	<input type="checkbox"/> Contact by <input type="checkbox"/> Contact with	<input type="checkbox"/> Trapped in <input type="checkbox"/> Caught on	<input type="checkbox"/> Caught Between <input type="checkbox"/> Same level fall	<input type="checkbox"/> Different level fall <input type="checkbox"/> Strain/Exertion	<input type="checkbox"/> Exposure to <input type="checkbox"/> Other
16. What condition of tools, equipment, or job site caused or contributed to the accident? Be specific				17. What did the employee do or fail to do that caused or contributed to the accident? Be specific			
<input type="checkbox"/> None				<input type="checkbox"/> None			
18. What caused or contributed to above condition(s)? Check all that apply. Answer only if item 16 applies				19. What caused or influenced above unsafe action(s)? Check all that apply. Answer only if item 17 applies.			
<input type="checkbox"/> 1. Caused by employee		<input type="checkbox"/> 9. Exposure to corrosion		<input type="checkbox"/> 1. Unaware of hazard		<input type="checkbox"/> 9. Fatigue influenced action	
<input type="checkbox"/> 2. Defective via normal use		<input type="checkbox"/> 10. Exposure to heat/cold		<input type="checkbox"/> 2. Didn't know procedure		<input type="checkbox"/> 10. "Under the Influence"	
<input type="checkbox"/> 3. Defective via abuse/misuse		<input type="checkbox"/> 11. Poor preventive maintenance		<input type="checkbox"/> 3. Low-level job skill		<input type="checkbox"/> 11. Defective vision	
<input type="checkbox"/> 4. Safety inspection failure		<input type="checkbox"/> 12. Ventilation defect		<input type="checkbox"/> 4. Ignored known hazard		<input type="checkbox"/> 12. Defective hearing	
<input type="checkbox"/> 5. Housekeeping failure		<input type="checkbox"/> 13. Caused by other employee		<input type="checkbox"/> 5. Tried to save time		<input type="checkbox"/> 13. Other physical condition	
<input type="checkbox"/> 6. Illumination defect		<input type="checkbox"/> 14. Cause other than above		<input type="checkbox"/> 6. Tried to avoid effort		<input type="checkbox"/> 14. Cause other than above	
<input type="checkbox"/> 7. Faulty design				<input type="checkbox"/> 7. Tried to avoid discomfort			
<input type="checkbox"/> 8. Faulty construction		<input type="checkbox"/> 15. Unable to determine		<input type="checkbox"/> 8. Illness influenced action		<input type="checkbox"/> 15. Unable to determine	
20. What action has been taken (X) or will be taken (✓) to prevent recurrence? (Mark all that apply.)							
<input type="checkbox"/> 1. Re instruction of person(s) involved		<input type="checkbox"/> 8. Job safety analysis ordered		<input type="checkbox"/> 15. Use of safer materials/supplies			
<input type="checkbox"/> 2. Reprimand of person(s) involved		<input type="checkbox"/> 9. Safety guard/device installed		<input type="checkbox"/> 16. Improved illumination			
<input type="checkbox"/> 3. Discipline of person(s) involved		<input type="checkbox"/> 10. Protective equipment required		<input type="checkbox"/> 17. Improved ventilation			
<input type="checkbox"/> 4. Preventive instruction of others		<input type="checkbox"/> 11. Tool/equipment repaired/replaced		<input type="checkbox"/> 18. Standardized job procedure			
<input type="checkbox"/> 5. Job reassignment of employee		<input type="checkbox"/> 12. Improved storage		<input type="checkbox"/> 19. Reduced noise/vibration			
<input type="checkbox"/> 6. Improved inspection procedure		<input type="checkbox"/> 13. Eliminated congestion		<input type="checkbox"/> 20. Improved temperature control			
<input type="checkbox"/> 7. Improved cleanup procedure		<input type="checkbox"/> 14. Improved design/construction		<input type="checkbox"/> 21. Correction other than above			
21. Describe details of corrective action taken or planned							
22. Person responsible for planned corrective action: By date:				Witness(es)			
24. Investigated by (signature and position):				25. Reviewed and approved by (signature and position):			
26. Outcome codes Enter that apply*:				Date:			
*1. Fatality		*2. No lost workdays		*3. Lost workdays		*4. Property/product damage	

Scott Builders, Inc.

“Near Miss” / Hazard Notification Form

NAME: (Not required) _____ Date: ___ / ___ / ___

Where did “Near Miss” or Hazard occur? _____

Please describe the situation: _____

Please fill out the appropriate section(s) below. Use the back of this form for additional explanation.

1. If situation could have caused Personal Injury, please check appropriate box on what could’ve happened!

<input type="checkbox"/> Struck by	<input type="checkbox"/> Contact by	<input type="checkbox"/> Trapped in	<input type="checkbox"/> Caught in-between	<input type="checkbox"/> Different level fall	<input type="checkbox"/> Exposure to
<input type="checkbox"/> Struck against	<input type="checkbox"/> Contact with	<input type="checkbox"/> Caught on	<input type="checkbox"/> Same level fall	<input type="checkbox"/> Strain and/or Exertion	<input type="checkbox"/> Other* (explain below)

*Other: _____

Possible extent of injury: _____

2. Property Damage: Explain what could’ve happened: _____

3. Product Damage: Explain what could’ve happened: _____

Action to be taken:

What action do you feel should be taken (✓) to prevent this loss (or loss potential)? (Mark all that apply.)		
<input type="checkbox"/> Re-instruction of person(s) involved	<input type="checkbox"/> Protective equipment required	<input type="checkbox"/> Improved ventilation
<input type="checkbox"/> Preventive instruction of others	<input type="checkbox"/> Tool/equipment repaired /replaced	<input type="checkbox"/> Improved illumination
<input type="checkbox"/> Job re-assignment of employee	<input type="checkbox"/> Improved storage	<input type="checkbox"/> Reduced noise/vibration
<input type="checkbox"/> Improved inspection procedure	<input type="checkbox"/> Improved housekeeping	<input type="checkbox"/> Improved temperature control
<input type="checkbox"/> Improved cleanup procedure	<input type="checkbox"/> Improved design/construction	<input type="checkbox"/> Safety guard/device installed
<input type="checkbox"/> Job safety analysis ordered	<input type="checkbox"/> Use of safer materials/supplies	<input type="checkbox"/> Correction other than above*

*Other corrective action not listed above comment below: (use back of form if necessary)

Scott Builders, Inc.

PROPERTY LOSS FORM

Person reporting loss: _____

Date of Loss: ____ / ____ / ____ Time of Loss: ____ : ____ a.m. / p.m. (circle one)

Property Damage? **Yes** **No** Product Damage? **Yes** **No** Theft? **Yes** **No**

Job-Site? **Job Name:** _____

Job Address: _____

Site Superintendent/Foreman: _____

Main Office? Address: _____

Office Manager: _____

Vehicle? Location at time of loss: _____

Vehicle #: _____ Driver Name: _____

Reported to Police? **Yes** **No** Police Report #: _____

DAMAGE

What caused damage to property/product? _____

THEFT

How was access to property/vehicle gained? _____

LIST ITEMS DAMAGED AND/OR STOLEN INCLUDING PURCHASE PRICE OR ESTIMATED VALUE

A. Attach additional sheets if necessary or use back of this form!

QTY.	MAKE / MODEL	DESCRIPTION / SERIAL #	PURCHASE PRICE / ESTIMATED VALUE
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Scott Builders, Inc.

Enforcement

I. Work Practices and Rules Enforcement

- A. Enforcing work standards and identifying proper behavior is essential to foster consistent employee performance in an established, acceptable manner. The objective of enforcement is to educate/convince the employee to change his or her behavior to increase the level of performance, and to encourage a continual level of performance. Disruptive behavior causing productivity problems in other employees must also be dealt with. Standards are based on evaluation of a work process that outlines the way the job should be performed. Certain modes of acceptable behavior are required of employees to achieve these standards and to avoid endangering themselves and other employees causing personal injury or property damage. Enforcement, which can take the form of recognition or punishment, is intended to encourage employees to perform their jobs in the designated manner.
- B. New company employees will require more attention in the training phases. Positive reinforcement, training and teaching should be used initially. Negative enforcement, or punishment, is not the best initial method to foster a good standardized level of performance or behavior. If punishment has to be used, it should be within a progressive disciplinary system. It is very important to document previous corrective attempts by outlining discussions with employees to correct deficiencies and documenting a clear description of the problem.
- C. Employees changing jobs within the company also require training and observations just as new employees do. Greater attention may have to be given since assumptions may be made regarding the ability of the employee.
- D. The Progressive Personnel Disciplinary System Process will be recorded utilizing the company's "Warning Slips" (attached) and affects all Scott Builders, Inc. employees, including the office personnel. The process is enforced by Management, the EHS Officer and/or Superintendent.

The following pages describe the type of offense and the resulting disciplinary action to be taken by the company:

Scott Builders, Inc. Company Rules and Disciplinary Measures

<u>OFFENSE</u>	<u>FIRST OCCURRENCE</u>	<u>SECOND OCCURRENCE</u>	<u>THIRD OCCURRENCE</u>
Scott Builders, Inc. prohibits its employees from carrying or possessing firearms while acting in the course and scope of employment. Violation of this policy may result in disciplinary action up to and including termination.	Discharge		
Theft from company or fellow employees.	Discharge		
Drinking alcohol or consuming drugs during working hours or while in company vehicle.	Discharge		
Reporting to work under the influence of drugs or alcohol.	Discharge		
Falsifying company records.	Discharge		
Possession of illegal weapons or company property.	Discharge		
Missing or damaging company property or property of fellow employees.	Written Warning	3 Day Suspension	Discharge
Smoking in unauthorized areas.	Written Warning	3 Day Suspension	Discharge
Leaving job site without permission.	3 Day Suspension	Discharge	
Unauthorized operation of tools, truck or equipment.	Written Warning	3 Day Suspension	Discharge
Disregard of safety rules.	Written Warning	3 Day Suspension	Discharge
Failure to wear specific safety equipment.	Written Warning	3 Day Suspension	Discharge
Failure to report injury or accident.	3 Day Suspension	Discharge	
Leaving job site before day's work is complete.	Written Warning	3 Day Suspension	Discharge
Unauthorized absence	Written Warning	3 Day Suspension	Discharge
Performing low quality work due to carelessness.	Written Warning	3 Day Suspension	Discharge
Lateness	Oral Warning	Written Warning	3 Day Suspension
Use of another employee's tools without permission.	Oral Warning	Written Warning	3 Day Suspension
Failure to follow specific instructions.	Written Warning	3 Day Suspension	Discharge
Fighting or attempting to Provoke a fight on company property or job site.	Discharge		
Inability to work together with other employees.	3 Day	Discharge	

<u>OFFENSE</u>	<u>FIRST OCCURRENCE</u>	<u>SECOND OCCURRENCE</u>	<u>THIRD OCCURRENCE</u>
	Suspension		
Removal of company records or release of any confidential information.	Discharge		
Failure to maintain accurate time on time card.	Oral Warning	Written Warning	3 Day Suspension
Failure to have all required tools.	Oral Warning	Written Warning	1 Day Suspension
Failure to maintain the first aid kits in each truck or trailer.	Oral Warning	Written Warning	1 Day Suspension
Failure to maintain trucks and keep them clean.	Oral Warning	Written Warning	1 Day Suspension
Failure to report any mechanical problems on trucks or equipment.	Written Warning	1 Day Suspension	Discharge
Failure to have proper safety equipment on job sites.	Written Warning	1 Day Suspension	3 Day Suspension
Failure to wear proper clothing on job site.	Written Warning	3 Day Suspension	Discharge
Any playing of radios or cassette players on job site.	3 Day Suspension	Discharge	
Stretching breaks, lunch or otherwise wasting time.	Written Warning	3 Day Suspension	Discharge
Insubordination by refusing Supervisor's orders.	3 Day Suspension	Discharge	
Failure to maintain production Standards.	Written Warning	3 Day Suspension	Discharge

- E. Flagrant work procedure, policy, or behavioral violations affecting the welfare of the offending employee or others may require disciplinary action outside the progressive disciplinary system. **Therefore, depending on the severity of the violation, the company may choose to immediately suspend or terminate employment, without prior written warning or suspension.**

II. Subcontractor Enforcement Policy

1. All sub-contractors are required to have a written disciplinary policy of their own. Scott Builders, Inc. shall be notified if a sub-contractor employee working on a Scott Builders, Inc. job-site is involved in any disciplinary process. This notification must be in writing detailing the offense and resulting actions taken by the sub-contractor.
2. In case of severe or willful violation of Scott Builder's safety and health policies (see above), the Company reserves the right to remove any worker immediately from the premises.

Scott Builders, Inc.
Verbal Warning Notice

Person giving Notice: _____ Date: ___ / ___ / ___

Employee Name (print): _____ # _____

Violation (describe exactly): _____

Date of Violation: ___ / ___ / ___ Time of Violation: ___ : ___ a.m./p.m. (circle one)

Circumstances surrounding Violation: _____

Remarks: _____

Corrective action to be taken: _____

Supervisor's Signature Date

Employee's Signature (not required) Date

Scott Builders, Inc.
Written Warning Notice

Person giving Notice: _____ Date: ___ / ___ / ___

Employee Name (print): _____ # _____

Violation (describe exactly): _____

Date of Violation: ___ / ___ / ___ Time of Violation: ___ : ___ a.m./p.m. (circle one)

Circumstances surrounding Violation: _____

Remarks: _____

Corrective action to be taken: _____

Supervisor's Signature Date

Employee's Signature (required) Date

Scott Builders, Inc.
Suspension Notice

Person giving Notice: _____ Date: ___ / ___ / ___

Employee Name (print): _____ # _____

Violation (describe exactly): _____

Date of Violation: ___ / ___ / ___ Time of Violation: ___ : ___ a.m./p.m. (circle one)

Date of Suspension: ___ / ___ / ___ Expected Return Date: ___ / ___ / ___

Circumstances surrounding Violation: _____

Remarks: _____

Corrective action to be taken: _____

Actual Return Date: ___ / ___ / ___ Time of Return: ___ : ___ a.m./p.m. (circle one)

Supervisor's Signature Date

Employee's Signature (required) Date

Scott Builders, Inc.
Termination Notice

Person giving Notice: _____ Date: ___ / ___ / ___

Employee Name (print): _____ # _____

Reason(s) for Termination (describe exactly): _____

Date of Termination: ___ / ___ / ___ Time of Termination: ___ : ___ a.m./p.m.
(circle one)

Circumstances surrounding Termination: _____

Remarks: _____

Supervisor's Signature Date

Employee's Signature (required) Date

Scott Builders, Inc.

Employee Discussion Form

Person leading Discussion: _____ Date: ___ / ___ / ___

Employee Name (print): _____ # _____

Reason for Discussion (check one or all that apply):

Insubordination	Refusal To Perform Assigned Tasks
Violation of Company Rules	Other
Violation of Safety Rules	Compliment

DESCRIPTION OF INCIDENT

(Please provide a complete and concise description of the circumstances which caused the issuance of this Discussion form. Be as specific as possible, including names and dates.)

If applicable, further violations will result in: _____

Corrective action to be taken: _____

Supervisor's Signature

Date

Employee's Signature (required)

Date

Scott Builders, Inc.
Notice of Unsatisfactory Performance

Person giving Notice: _____ Date: ___ / ___ / ___

Employee Name (print): _____ # _____

The intent of this notice is to inform you that your performance has not been satisfactory for the reasons indicated below and to provide you with an opportunity to cooperate with your Supervisor in correcting this situation. If this situation is not corrected, you will be subject to further disciplinary action.

Unsatisfactory Performance Issue(s): _____

Employee Comments: _____

Corrective action to be taken: _____

Supervisor's Signature

Date

Employee's Signature (required)

Date

Scott Builders, Inc.

Employee Review Form

Definitions:

<p>U -Unsatisfactory Performance M -Marginal Performance (requires Improvement) S -Satisfactory Performance S+ -Satisfactory Plus Performance (consistently exceeds position requirements) SE -Superior or Exceptional Performance NA -Not Applicable to this position</p>	<p>Employee: _____ Employee # _____ Date: ____ / ____ / ____ Supervisor: _____</p>						
ATTRIBUTE	U	M	S	S+	SE	NA	COMMENTS
1							Sets good example
							Attendance
							On time
							Return from breaks promptly
							Attitude
							Follows all safety procedures
							Work habits
2							Job knowledge and skills
3							Paperwork (complete/accurate)
4							Quality of work (thorough/accurate)
5							Cooperation and Team Work
6							Initiative (being pro-active)
7							Quantity of work (productivity)
8							Dependability
9							Ability to understand and follow instruction
10							Reporting problems to the Supervisor.

Additional Comments: _____

Supervisor's Signature Date

Employee's Signature (required) Date

Scott Builders, Inc.

Annual Objectives

Each year the company will review the Safety, Health and Loss Prevention Program. Management will set objectives for controlling loss. The company will concentrate on objectives that reduce accident frequency: reducing severity of injuries; completing required training; reviewing new and existing training requirements and Standard Operating Procedures on key jobs.

Scott Builders, Inc.

SAFETY PROGRAM OBJECTIVES - ACTION PLAN

#	Planned Activity	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
1.	10 Hour Construction Outreach Class Session	X	X										
2.	All Program development		X	X	X								
3.	Review and update for ISNetworld					X	X						
4.	Update training as needed								X		X		X
5.	Goals and Objective Meeting												X

Notes/Comments:

Scott Builders, Inc.

RETURN-TO-WORK POLICY

Scott Builders, Inc. supports the practice of returning injured employees to work, as soon as medically possible, to a position within our Company compatible with the employee's restrictions. This program will be coordinated with our Worker's Compensation Insurance carrier.

The prompt return of an injured employee to a position within medical restrictions will regain a sense of job security, retain self-esteem, and help to re-establish the pre-injury lifestyle. Scott Builders, Inc. in turn retains an experienced employee, maintains continuity in the work force, limits needless medical cost, and benefits from the employees experience. We believe this practice serves the best interest of both, the injured employee and the Company.

All injuries, no matter how minor, must be reported to your Supervisor immediately. Your Supervisor will report the injury to the Claims Coordinator within 24 hours, and will assist you with transportation to the nearest medical care facility. Our Claims Coordinator is *Jean Scott*. Any questions concerning your Workers' Compensation claim should be directed to this individual.

The injured employee's current position very well may be modified to fit medical restrictions. If this is not possible, a temporary modified duty position will try to be made available that may be different from the regular job. Modified duties will be determined at the time of need.

President Signature: _____

Scott Builders, Inc.

RETURN-TO-WORK PROGRAM

I. Program's Working Guide

A. The Program

Our Return-to-Work Program is a system developed by this company to return the injured worker, within medical restrictions, to the workplace as soon as the employee is capable of performing some work activities for the company. The program is designed to help the company to cost-effectively and successfully manage employees' work related claims. This program provides our employee with a sense of job security after an injury that is an important aspect to recovery.

Our Return-to-Work Program is good business sense helping both the company and employee. The Program does the following in helping reduce our workers' compensation cost:

1. Reduces claim cost which affect workers' compensation insurance premiums.
2. Establishes a plan of action before an injury occurs.
3. Returns injured employees to work more quickly, helping the company maintain productivity.
4. Provides a sense of job security to employees.
5. Helps injured employees maintain self-esteem.
6. Reduces training costs.

B. Medical Care

After an occupational accident, resulting in injury, a clinic or physician in the area may be selected by the injured employee, our company or by the insurance company to provide medical services to our injured employees. We encourage open communication among the chosen provider, employees, and the insurance company that results in a more successful Return-to-Work Program.

C. Claims Coordinator

The company's appointed Claims Coordinator is *Jean Scott*. This person coordinates workers' compensation claims and our Return-to-Work program, and aid in the claims processing. This person will ensure the Program will be organized, run smoothly, and be consistent.

The Claims Coordinator will follow the Return-to-Work procedural steps outlined in the Company's Program. The Claims Coordinator will also have the authority to act on a claim in conjunction with the Supervisor.

D. Modified Work

Modified jobs in our company are a critical step in our Return-to-Work program. These jobs provide an opportunity for our employees to begin working again as soon as possible within medical restrictions. The company should benefit by lowering claim cost and maintaining a level of productivity. The company will take a proactive stance in identifying modified jobs for our employees. We have flexibility in this plan. Modified jobs can consist of the following:

1. Part-time employment (for example 2, 4, or 6 hours a day).
2. The creation of a temporary job to meet the employee's work restrictions.
3. Job modifications or redesign to meet the employee's work restrictions.
4. Designated existing jobs with lesser physical requirements.
5. Alternating jobs to accommodate the injured employee.
6. A different job within the company, even if at a lower wage.

II. Claims Coordinator and Supervisor's Guidelines

A. Responsibilities of the Claims Coordinator

1. To work with the Supervisor, employees, and the insurance company to identify and develop modified jobs into which an injured employee can be placed when returning to work. Annually review the list of those jobs with the Supervisor; the list can be expanded. Know whom the insurance company has assigned as our claims adjuster and the phone number.
2. Instruct employees to report work-related injuries to the Supervisor just as soon as they occur.
3. Instruct all Supervisors to notify you of the injuries on the day of occurrence.

4. Prepare and mail a First Report of Injury to our insurance company handling Workers' Compensation. If necessary, send a separate letter describing additional circumstances surrounding the injury and advising the insurance company of any information that may be useful in better managing the claim. Also submit all available medical information regarding the injured employee. If the employee is injured by a piece of equipment, is injured by a third party, or is very seriously injured, contact the insurance company directly. If practical, shutdown the equipment immediately and preserve any evidence until the insurance company can investigate. An investigation of the scene may enable a possible recovery against a third party.
5. On the first day of lost time, or as soon as possible thereafter, contact the injured employee to arrange for a personal meeting. If such a meeting is not possible, at least make immediate telephone contact. The purposes of the contact are to:
 - a. Describe workers' compensation, sick-leave, disability and other available insurance benefits. Also, indicate where to send work related medical bills in the event that the injured employee receives them from the medical provider.
 - b. Explain the employer's expectations regarding communications throughout the employee's period of disability. Explain your need to have the employee visit the employer at least weekly, if possible and to call immediately following each doctor's appointment.
 - c. Discuss with the employee the company's commitment to Return-to-Work, the availability of modified jobs, and the company's eagerness to have the employee back to work.
 - d. Show concern to an employee who is injured. This is very important!
6. Call the treating physician immediately after an injury and regularly thereafter to discuss the injured employee's condition, Return-to-Work status and opportunities, and the date of the next scheduled appointment. Continue this contact even after the employee is back to work at a modified duty job.
7. Contact the insurance claim adjuster when new information is learned from our injured employee or the treating physician regarding the injury or the employee's recovery.
8. Contact our injured employee weekly for as long as the employee is unable to Return-to-Work. Inquire about the employee's disability status, all medical treatment to date, the treating physician's evaluation of the injury, and the injured employees own evaluation of the condition. Specifically ask the employee of any problems or concerns and ask about current difficulties and capabilities. Document this information.
9. When the treating physician releases the employee to a modified job or to the employee's regular job, contact the insurance claims adjuster. Then call the employee to discuss the work release and job opportunities. Arrange for a return-to-work date. The employee should know details of the job, and where, when, and to

- whom to report. In situations involving long-term restrictions or other complications, send a certified letter to the employee's residence prior to maximum medical improvement (MMI) confirming the job offer. Be sure to follow up on this; if you receive no response to the letter from the employee within two weeks, send it again.
10. Do what you can to facilitate a smooth Return-to-Work for the employee. Make sure you contact the employee's Supervisor (especially if the Supervisor is different from the employee's original Supervisor prior to the injury) to inform of the details of the employee's return. Accommodate the employee's reasonable request, such as allowing sufficient lead time to arrange childcare, transportation, etc. Instruct the Supervisor to inform you immediately if the employee does not report when scheduled. Contact the employee and the insurance claims adjuster to obtain additional information and direction.
 11. After the employee has returned to work at a modified job, continue to contact the employee and the Supervisor weekly to review progress on the job. Make necessary physical adjustments, evaluate attitudes, and formulate goals for safe return to full duties, if possible. Contact the treating physician after each employee visit in order to re-evaluate current job restrictions. Emphasize to Supervisor, and to the employee's co-workers that the physician's restrictions are always to be followed, even if the injured employee believes more can be done.
 12. Instruct the Supervisor to inform you if capabilities appear to be greater than restrictions. Pass this information along to the physician for a review and update of the restrictions.
 13. Report return to work hours and wages and any subsequent changes in them along with updated medical information to the claims adjuster at the insurance company.
 14. When the employee reaches maximum medical improvement, coordinate with the claims adjuster to send a letter by certified mail to the employee's residence, a formal PERMANENT JOB OFFER AFTER MMI. It is recommended to formally notify the employee that the job is permanent even though the employee is already back at the regular job, or a modified job. Notify the insurance adjuster of the employee's response.
 15. Document all contacts with the injured employee in the claim file.
 16. Ensure that the OSHA 300 log of work-related injuries and illness accurately records/updates work related injuries.

B. Responsibilities of the Supervisor

1. Report all potentially lost time work-related injuries immediately to the Claims Coordinator. Provide information necessary to complete the First Report of Injury

- and the Minnesota Workers Compensation Information Sheet. When possible, provide a supplementary accident investigation report to the Claims Coordinator.
2. Whenever possible, identify jobs that can be performed by employees who have modified job restrictions.
 3. Transport the injured employee to the nearest clinic, physician or hospital emergency room by a designated individual or yourself.
 - a. Provide the injured employee with the “Report of Workability” form before going to the selected medical facility. This form must be brought back by the employee to the Supervisor who in turn sends the form to the Claims Coordinator.
 - b. Ask the treating physician or the hospital emergency room to call you back on the condition of the injured employee.
 - c. Immediately inform the Claims Coordinator if the employee will be off work completely.
 4. The Accident Report is to be completed and sent to the Claims Coordinator within 24 hours.
 5. As soon as one of your workers becomes injured, it is your job to work with the Claims Coordinator to arrange for the employee’s Return-to-Work ideally in the employee’s original job, or in a modified job, if necessary. Slight modifications to the original job may be all that is necessary to keep the employee in that job.
 6. When the injured employee returns to work, address the following issues.
 - a. Review the employee’s “Report of Workability” with the employee.
 - b. On the basis of the “Report of Workability” form, discuss the physical limitations of the injured employee.
 - c. Review identified modified work task and place the injured worker in a job that is within the medical restrictions.
 7. Work with the Claims Coordinator to contact the injured employee about his/her progress, job opportunities, Return-to-Work, etc. Maintain frequent contact with the employee so he/she doesn't get “lost”.
 8. Once the employee is back to work with restrictions, only allow the employee to perform job tasks approved by the physician. Instruct co-workers to respect the restrictions and enforce them also. If the Supervisor or the employee feels that he/she is capable of more than the restrictions indicate, contact the Claims Coordinator so a review of the restrictions with the physician can be done.
 9. When an employee calls in sick, ask, "what is wrong." If the employee states that he/she has sore muscles, etc. do not ask if the injury is work related. Ask what

happened and let the employee tell you what happened. If the employee indicates that it is work related, begin the process from the beginning of this section.

10. It is up to the insurance company to determine whether an injury is work related: the determination is not made by our company.

Scott Builders, Inc.

JOB OFFER PRIOR TO MMI

PLEASE NOTE:

The letter should be used for a job offer made before your employee has reached maximum medical improvement. After maximum medical improvement is reached, you should offer a permanent offer. If the employee returns to work before MMI and the position is or becomes permanent, send a permanent job offer to the employee after MMI to be sure.

This letter should be modified as needed and typed on your own company letterhead.

The letter should be sent certified mail with a return receipt requested to document that the job offer was received.

If an injured employee fails to respond, reissue the letter approximately two weeks after the first letter was sent with a cover letter stating that the position is still available.

The job offer may also be given orally, with the letter acting as a follow-up piece of documentation.

Scott Builders, Inc.

JOB OFFER PRIOR TO MMI

Date

Employee's Name

Address

Address

Dear _____:

We have recently been informed that you may return to work if a position is identified that meets your physical requirements and limitations. I am writing to let you know that we have a job available for you that meets the physical requirements as stated by Dr. _____ on _____.

The position title is _____. Your work hours will be from _____ on (days of week). The weekly/hourly wage will be _____. Your benefits will remain the same as before your injury, or will be as follows: (insurance, vacation, sick pay, etc.)

The job duties are : (May attach job description)

The job involves these physical requirements:

If you have any difficulties performing this job, please notify (name of Supervisor) immediately, so that any necessary modifications can be made.

This position is available immediately/will commence on (Date). We are looking forward to your return. Please call me as soon as possible to arrange for your return to work. If you have any questions or concerns about this position, the physical requirements for the same, or your stated physical capabilities, please call me

Yours truly,

Name

Title

Telephone number

Scott Builders, Inc.

PERMANENT JOB OFFER AFTER MMI

PLEASE NOTE:

This letter should be used for a job offer given after your employee has reached maximum medical improvement, and to re-offer or confirm the permanent nature of a position offered or accepted before maximum medical improvement.

This letter should be modified as needed and typed on your own company letterhead.

The letter should be sent certified with a return receipt requested to document that the job offer was received.

If the job offer is refused or there is no response within a period of 14 days or whatever is appropriated for the state, notify the insurance claims adjuster immediately.

The job offer may also be given orally, with the letter acting as follow-up piece of documentation.

Scott Builders, Inc.

PERMANENT JOB OFFER AFTER MMI

Date:

Employee's Name

Address

Address

Dear _____:

We have recently been informed that you may return to work if a position is identified that meets your physical requirements and limitations. I am writing to let you know that we have a permanent job available for you that meets the physical requirements as stated by Dr. _____ on _____.

The position title is _____. Your work hours will be from _____ on (days of week). The weekly/ hourly wage will be _____. Your benefits will remain the same as before your injury, or will be as follows: (insurance, vacation, sick pay, etc.).

The job duties are: _____(may attached job description)_____

If you have any difficulties performing this job, please notify (name of Supervisor) immediately, so that any necessary modifications can be made.

We are looking forward to your return. Please call me as soon as possible to arrange for your return to work. If you have any questions or concerns about this position, the physical requirements for the same, or your stated physical capabilities, please call me. You have fourteen calendar days to accept or reject this job offer. Failure to respond during this period is deemed a refusal of the offer.

Yours truly,

Name

Title

Telephone number

Scott Builders, Inc.
INJURY INFORMATION FOR PHYSICIAN

Company: Please complete and send this form with our injured employee at the time of his/her first visit with the physician. The physician should sign the form at the bottom.

Scott Builders, Inc.
12 Division Street E
Buffalo, MN, 55313-1600
Office: (763) 684-0000

Employee: _____

Date of Injury/Illness: _____

How Injury Occurred (If traumatic force involved, approximate amount of force and duration)

Observed by Other(s)? _____

Time Between Injury and Treatment _____

Previous Injuries and Illness _____

The employee will need to advise the physician of current medications and allergies.

For more information from our company, contact:

_____ Phone Number: (____) ____ - ____

Physician Signature _____ Date: __ / __ / __

Scott Builders, Inc.

Workers' Compensation

I. General

A. Insurance

Workers' compensation insurance provides compensation to employees who have a work-related injury or diseases. These are conditions that are caused, aggravated, precipitated or accelerate by the work or the work environment. The compensation includes partial wage replacement and full payment or reasonable medical and rehabilitation cost. In case of death, workers' compensation benefits are paid to the employee's dependents. Prior to October 1 1992, the law had a "two tier" system that provides financial incentives to get injured workers with permanent impairments back to work quickly. Present Workers' Compensation law eliminated the two-tiered economic recovery and impairment compensation benefit system, and replaced it with one permanent partial disability system. These indemnity payments would be paid if the employee returns to work (in a lump sum) 60 days after the employee returns to work, or if the employee does not return to work, payments will be in weekly installments at the same level and scheduled as temporary total benefits.

B. Coverage

1. Workers' compensation covers injuries that "arise out of and in the course and scope of employment." This does not mean that the coverage is limited to just working hours or to the normal workstation. For example, if an employee is hurt in your company parking lot on his or her way to work, that injury may be considered within the course and scope of the employment. On the other hand, if the employee leaves the place of employment on a personal errand, for example, and is injured during that time, the injury probably will not be compensable. Generally, employees are not covered by workers' compensation during the time they are going to and from the workplace, but there are some exceptions to this.

One exception may be when the job involves work away from the plant or office. For example, a salesperson may be considered to be on the job from the time of leaving home until the time of return. Another exception is when an employee is called back to work to do a special errand. In this case, the employee is covered from the time of leaving home to the time of return.

2. Generally, all employers are required to have workers' compensation insurance and to display the notice of the insurer in a conspicuous place.
3. Certain types of employers are exempt from carrying workers' compensation insurance, including some small family farms and family businesses.

4. Employees are covered by the Minnesota Workers' Compensation Act if they are hired in Minnesota and generally work here, even if they are required by their jobs to go out of the state or they are transferred temporarily to an assignment out of the state or overseas.

C. Work Related Disability

1. A work related disability is a physical condition that is either caused, aggravated, precipitated or accelerated by the work activity or the work environment. The disability could be caused by a traumatic incident, such as a fall from a ladder, or an accident with machinery. It could also be the result of the gradual effects of normal work activities, such as carpal tunnel syndrome arising from repetitive movement, or could be the result of exposure to hazardous materials.
2. To be covered by worker's' compensation insurance, the injury or disease must arise out to their employment; that is, it must be caused by the employment risk, not by daily activities that are not work-related. The Workers' Compensation system is a no-fault system: the employee does not have to prove negligence on your part, and negligence on the part of the employee is not a defense for the employer.

D. Benefit Types

1. Wage Replacement-for the period during which the employee is unable to work or unable to earn as much as his or her pre-injury wage.
2. Loss of Body Function- Payment for the loss of or permanent damage to body parts (such as a hand, a finger, or a leg).
3. Medical Costs-all reasonable current and future costs arising from or connected to the evaluation and treatment of a work related injury.
4. Rehabilitation Cost-(including but not limited to) counseling, job placement, evaluations, and testing, on-the-job training vocational or college education, or other activities necessary to prepare the employee to return to his or her old job or a new job.

E. Maximum Medical Improvement (MMI)

Maximum medical improvement is the point in an injured employee's recovery at which not further significant, lasting improvement can be anticipated based on reasonable medical probability. In simple term, it is the point at which an employee is as well as he or she will go. Maximum medical improvement will vary with the individual and the severity of the injury because some people heal faster than others do. A report from a physician is needed to establish that an employee has reached MMI.

II. Reporting a First Report of Injury

A. Time Limitations

1. When an employee is injured, it is the *company's responsibility*, not the employee, to complete the First Report of Injury form. It is important that we file the report promptly, *within 24 hours*, if possible, so our insurance company will have a chance to investigate the claim. The reason is the insurance company only has 14 days in which to file the report with the Workers' Compensation Division from the time of the injury. We, our company, have 10 days to submit the First Report of Injury to the insurance company once we have knowledge of the claim. If we wait the 10 days, it only leaves the insurance company four days to investigate the claim for coverage. It is very important to give the insurance company the First Report of Injury as quickly as possible. If we (the company) do not submit the Report, we will likely be fined by the State.
2. If we do not have all the information for the report before the ten days is up, send the form to our insurance company with whatever facts you do have. We can forward additional information later.
3. When we complete a First Report of Injury form doesn't mean that we are accepting liability for the injury. The insurance company will pay on the claim only after it has investigated it and determined that it likely is compensable.

B. Death or Serious Injury

1. **The Company is required to report work related incidents that result in the death of an employee within 8 hours and the inpatient hospitalization of an employee, any amputations or eye loss within 24 hours to OSHA. The report must be made orally to OSHA either via phone or in person. Voice message or written notification are not acceptable!**
2. **The company has to report a death to the insurance company within 48 hours after its occurrence.** The report to OSHA must include the employer's name, the location and time of the incident, the type of event (death, hospitalization, amputation, loss of eye), the number of employees who suffered the event, names of the employees who suffered the event, the name and phone number of a contact person, and a brief description of the incident. *Note: An incident that is not immediately reportable becomes a reportable incident if it results in the death of an employee within 30 days. Also, employers only have to report an inpatient hospitalization, amputation or loss of an eye that occurs within 24 hours of a work related incident.*

If the Claims Coordinator is not available, go directly to the Superintendent to initiate the reporting process. The report can be initiated by telephone, email, or personal notice, and file a written report of the injury within seven days from its occurrence or within such time as the Commissioner of Labor and Industry designates.

3. Where any other injury occurs which wholly or partly incapacitates the employee for performing labor or service refer to the above Section "A" for submitting First Report of Injury Form.

Scott Builders, Inc.

Drug and Alcohol Testing - General Information

*The following is a summary of MN Law regarding Drug and Alcohol.
This is not designed to replace regulation nor is this a complete Drug and Alcohol Program.
For further detail refer to MN State statutes.*

A. Who May Be Tested:

1. Employees and job applicants.
2. Independent contractors.
3. Other persons performing services for compensation for the Company.

B. Drug and Alcohol Testing May Not Be Performed Unless:

1. There is a written drug and alcohol testing policy.
2. Notice of the policy posted.
3. Prior written notice of policy to all affected individuals.

C. Right to Require Testing:

1. Job applicants, but only if all applicants for a particular position are required to undergo the testing and after a job offer is made.
2. As part of a routine physical examination so long as there is two-week written notice of the test.
3. Permissible random testing of those employees in a “safety sensitive” position which is defined as any position where an impairment would threaten the safety and health of another person.
 - a. Upon reasonable suspicion.
 - b. That the employee is under the influence.
 - c. Violation of written policy prohibiting use, sale or possession of drugs or alcohol where the employee is working.
 - d. Has sustained a personal injury or caused another to sustain a personal injury.
 - e. Has caused a work related accident.

4. Following chemical dependency treatment where the employer has referred the employee to treatment or treatment was provided under an employee benefit plan. In those cases, drug or alcohol testing may be performed without notice for up to two years following completion of the program.

D. Refusal to Take Test

May discipline up to and include discharge so long as policy indicates the specific consequences of refusal and other posting and notice requirements are met.

E. Testing Standards

1. Licensed outside laboratory.
2. Immediate confirmation re-testing of all positive samples.
3. All positive test samples retained for at least six months.

F. Right to Discipline

1. Only temporary suspension or transfer is permitted until test of a confirmation is performed.
2. No right to discharge after first confirmed positive test unless employee is given opportunity to participate in a chemical dependency program under an employee benefit plan or at his/her own expense.

G. Confidentiality

Extensive confidentiality requires a written release from the employee.

H. Effect on Workers' Compensation Injuries

Anecdotal evidence that drug and alcohol testing may decrease injuries in the work place.

I. Caveats

Not an area an employer should wander into casually. It is strongly recommended that an employer get legal advice before instituting a drug and alcohol testing policy.