



Proof of Training

Print name: _____ Signature: _____ Date: _____

Subcontractor Management Plan

Purpose

The purpose of this program is to ensure subcontractors are aware of and performing to Unger Construction's expectations.

Scope

This policy will apply to all work performed by workers and subcontractors including, but not limited to the following activities: construction, installation, demolition, remodeling, relocation, refurbishment, testing, and servicing or maintenance of equipment or machines and at other times when subcontractors are performing work.

Responsibilities

Management (Board of Directors and Project Managers)

Management is responsible for ensuring that the materials (e.g., tools, equipment, personal protective equipment) and other resources (i.e., worker training materials) required to fully implement and maintain this program are readily available where and when they are required. Additionally, management will monitor the effectiveness of the program, provide technical assistance as needed, and review the program bi-annually.

Program Manager

Dave Simpson is responsible for the development, documentation, training and administration of the program. This position carries the responsibility of insuring this program is adhered to and that proper reporting is executed.

Supervisors (Superintendents and Foreman)

Supervisors are responsible for ensuring that a task specific job hazard analysis (JHA), also known as a safe work plan, is developed. The JHA will select, implement and document the appropriate site-specific control measures as defined within this policy. Supervisors will direct the work in a manner that ensures the risk to workers is minimized, adequately controlled and that practices defined by this policy will be followed. Supervisors are responsible for ensuring Unger Construction employees and subcontractors are following expectations. Supervisors will be held accountable for enforcing the requirements of this program. Undesirable behavior will not resolve itself, therefore supervisors must be directly involved with modifying behaviors inconsistent with program expectations. Supervisors will be held accountable for enforcing Unger Construction's disciplinary program.

Workers (Employees and Subcontractors)

Unger Construction has high expectations and requires safety excellence for each employee, crew, project and for our entire company. Workers are required to follow the minimum procedures outlined in this program. Workers are responsible for knowing the hazards and the control measures established in the JHA. Workers are responsible for using the assigned PPE in an effective and safe manner. Workers are responsible for stopping unsafe acts and correcting unsafe conditions on the spot as soon as they are discovered. Any deviations from this program must be immediately brought to the attention of your supervisor. Workers that choose to conduct themselves in a manner that is inconsistent with these expectations will be held accountable for those decisions and may incur disciplinary actions.

Hazardous Material Survey

Unger Construction requires hazardous materials surveys before demolition or renovation work begins. The survey shall include all of the following: A visual inspection of a facility or a portion thereof for suspect materials, sampling and laboratory analysis of any suspect materials found for the presence of asbestos. The hazardous materials survey will also furnish a written report that includes: a description of the area(s) visually inspected, a detailed description of any suspect material sampled, the results of any laboratory analysis of suspect materials, the method of analysis, and the total amount of asbestos containing material. Typically a floor or roof plan is included with the report to reference the written information visually.

The person conducting the survey must be certified pursuant to OSHA and/or EPA regulations. The survey may be performed by a certified Site Surveillance Technician (SST) under the supervision of a licensed consultant. Note: The survey may be performed by a certified Site Surveillance Technician (SST) under the supervision of a licensed consultant. Note: The survey needs to be kept in a project file so that it can be accessed when working on future projects.

If lead or asbestos have been confirmed to be present employees and subcontractors must follow Unger Construction's Lead and/or Asbestos program. If hazards such as asbestos or lead will be disturbed during remediation, a properly licensed professional must perform the work and follow appropriate regulations.

Job Hazard Assessment (Safe Work Plan)

Unger Construction utilizes JHA's as our means of hazard assessment and establishing a safe work plan. JHA's are performed by supervisors and/or workers. Our library of hazard assessments is maintained on the "S" drive. Before beginning a new task refer to the JHA library, generally speaking all scopes of our work are covered. For situations that have not yet been covered select one that is substantially similar and use it as a baseline. JHA's on the "S" drive are organized by work area and job description. JHA's include strategies for elimination, substitution, engineering and administrative controls. After applying all appropriate reduction and elimination technique, the remaining hazards will be analyzed and the proper PPE to reduce the hazards will be selected. PPE will be identified for hazards that are in the process of being reduced or eliminated and/or when hazard-reduction efforts are not 100% effective in eliminating the hazards.

For complex or moderate to high hazard tasks, tasks where an additional level of safety planning is needed, the safety director will perform the JHA with the supervisor and workers.

Subcontractor Management Process

Pre-Qualification

Subcontractors shall be pre-qualified based on their safety statistics for the past 3 years. OSHA recordability (TRIR) and Days Away Restricted Transferred (DART), Fatality Data will be reviewed. Subcontractors with rates above the national average for their scope of work (NAISC) shall be rejected. Citation history from OSHA and EPA will be reviewed. Subcontractors with citations classified as serious will be rejected. Experience modification rates (EMOD or X-Mod) will be reviewed subcontractors with an EMR above 1.25 will be rejected.

Additionally, subcontractors safety programs based on their scope of work will be reviewed. Typically the programs reviewed will be Fall Protection, Respirators, Pretask planning, Scaffolding, Emergency procedures (first aid, medical response and spill management) Hazard Communication (MSDS/SDS's, labeling, handling and chemical inventory), Mobile elevated work platforms (MEWP) and Powered Industrial Trucks (PIT) and Heat Illness Prevention.

Prior to onsite mobilization

Subcontractors will be included in Pre-job meetings and kick-off meetings. All subcontractors (and their second tier subcontractors) are required to develop and submit a safe work plan (some organizations call them job hazard analysis others call them pre-task plans) to be reviewed for their scope of work. The safe work plan must be reviewed and approved by Unger Construction before crews can mobilize to the site. If this process is unfamiliar Unger Construction will assist with developing a safe work plan.

Proof of training and or certification needs to be submitted to the Unger Project Manager for all workers that will be working on the jobsite, before the subcontractors can start work. For example powered industrial equipment, heat stress, powder actuated tools, scaffold, and fall protection to name a few. See the job startup Safety Checklist for a complete listing of OSHA's required training.

Post Project

Lessons Learned will be performed at the end of each subcontractors contracted work. Pluses, deltas and gap closing actions will be documented. Prior to returning to another Unger Construction project the gap closing actions shall be reviewed and progress measured. Failure to complete gap closing actions or make measurable progress could be reason for rejection during prequalification of the next project.

Pre-Task Planning

All subcontractors are required to furnish to Unger Construction a Job Hazard Analysis (JHA), safe work plan or Pretask plan prior to commencement of work on site. The JHA shall cover general and specific work activities, all related hazards, and actions to be taken to eliminate the hazards. The JHA shall be submitted to Unger Construction and approved prior to commencement of work. The subcontractor shall go over the JHA with all workers on site as part of their training. Subcontractors may be required to submit additional JHAs by Unger Construction not covered by the original JHA during the course of work. Subcontractor shall perform and document pre-task planning to identify any hazards related to their work.

Performance to Expectations

Performance to expectations are managed via minute daily “all hands” safety coordination huddles comprised of all trade partners on the jobsite. In essence, the huddles review who is doing what, when, where, why and how they are planning on doing it. The meeting allows for improved communication amongst trade partners as it highlights potential work conflicts that can be discussed and corrected before work begins. We believe the huddles build better team harmony, improves communication and productivity across the trades leading to better safety performance.

Unger Construction also utilizes daily safety audits by our foreman, superintendents and project engineers. These inspections often times lead into discussions with senior project management staff and field workers. Safety audits that are conducted by non-safety professionals further demonstrate that safety (injury and illness prevention) is everyone’s responsibility.

Stop Work Card

At Unger Construction safety excellence is an expectation. Every worker/subcontractor must adhere to our safety policies, procedures and be in full compliance with applicable governmental laws, rules and regulations. With that said each and every worker/subcontractor is empowered by Unger Construction’s senior management team to stop unsafe acts or correct conditions that to the worker appears to be unsafe.

As members of the Unger Construction family we expect workers/subcontractors to follow our safety policies to the letter. It is the responsibility of every worker/subcontractor who knows of an activity that violates our safety policies, procedures or may be in violation of regulations, to stop such activity promptly. Additionally, workers/subcontractors are expected to look out for themselves and to lookout for each other. If something does not: Look right, Sound right, Seem right, Feel right or Smell right.

Unger workers/subcontractors can stop unsafe acts or correct unsafe conditions by presenting their Stop Work Card. When a stop work card is presented work must stop immediately. Work cannot restart until a better, safer way of performing the work can be developed. Or it is determined that the current practice is appropriate.

Issues that cannot be handled peer-to-peer (Stop Work Card)

Issues that cannot be handled peer-to-peer (Stop Work Card) are brought to the attention of the project leadership team. The project leadership team brings in the supervisors of the offender and the offender for a formal discussion about performing to expectations. The discussion will be documented, appropriate changes will be made or the offender will be removed from the project.

Disciplinary Process

Unger Construction has high expectations and requires safety excellence for each worker, crew, construction project and for our entire company. Every worker must adhere to our safety policies, procedures and be in full compliance with applicable governmental laws, rules and regulations. Workers that choose to conduct themselves in a manner that is inconsistent with these expectations will be held accountable for those decisions and may incur disciplinary actions.

Unger Construction Co. expects every worker to observe safety rules established for worker protection, abide by all laws and regulations, use safety equipment and devices as provided or required, and to always work in a manner which safeguards the worker and their fellow workers.

Unger Construction may find it necessary to apply discipline or corrective measures if a worker does not meet our safety expectations. Disciplinary action will vary depending on the individual set of circumstances. Under certain circumstances the company may immediately discipline, suspend or terminate a worker.

Discipline will be applied fairly and fit the circumstances. The seriousness of the offense, the worker's disciplinary history and performance history will be considered when determining the level of discipline to be applied.

Progressive disciplinary counseling is encouraged, beginning with a written warning, followed by a suspension with or without pay, followed by removal from the project. Depending on the severity of the violation, certain circumstances may necessitate elimination of some or all of the steps of progressive discipline in other words moving directly to suspension or removal from the project.

Each incident will be investigated with absolute honesty and integrity. To ensure balance, each incident will be investigated by the worker's supervisor, the department director and Human Resources. The investigation will be full, fair, accurate and timely and the results could have one of the following outcomes and corresponding actions: No evidence to support further action – closed without action. Insufficient evidence to confirm or deny allegations – investigation will be saved but no action will be taken. Allegations confirmed – written warning, suspension (without pay), or removal from the project. If the allegations are confirmed a formal session will be conducted with the worker and the members of the investigation team. The findings and corrective actions will be documented and presented to the worker during the formal session.

Repeat offenses, breaking the same rules, multiple offenses, or breaking more than one rule may be grounds for disciplinary escalation.

Gross misconduct, such as egregious or conspicuously flagrant or objectionable behavior or actions by a worker, such as conduct that endangers the well-being of other workers may render a worker ineligible for rehire.

The Disciplinary Steps:

Progressive disciplinary counseling is encouraged, beginning with a written warning, followed by a suspension with or without pay, followed by removal from the project. Depending on the severity of the violation, certain circumstances may necessitate elimination of some or all of the steps of progressive discipline in other words moving directly to suspension or removal from the project. All decisions in this regard are final and at the discretion of the Unger Construction Superintendent.

1. Verbal Warning

The first time a supervisor observes a worker not complying with the provisions of the Code of Safe Practices, the supervisor shall give the worker a verbal warning that such behavior is in violation of company policy and is not to be tolerated. This and subsequent disciplinary steps can be skipped over at

the sole discretion of the supervisor and the Unger Construction Superintendent. Be advised that if the severity of the violation may have or had the potential to have endangered other workers, the general public, or company assets, the worker committing the violation may be removed from the project without a previous warning. Removal from the project shall be made by the supervisor or the Unger Construction Superintendent. All decisions in this regard are final and at the discretion of the Unger Construction Superintendent.

2. Written Warning

If, after the verbal warning, a supervisor observes a worker still not complying with the provisions of the Code of Safe Practices, the supervisor or the Unger Construction Superintendent shall give the worker a written warning that such behavior is in violation of company policy and is not to be tolerated. All decisions in this regard are final and at the discretion of the Unger Construction Superintendent.

3. Time off with No Pay (suspension)

If a worker continues to not comply after receiving a verbal and written warning, the worker shall be suspended from working without pay for 3 days and requested to leave the jobsite. All decisions in this regard are final and at the discretion of the Unger Construction Superintendent.

4. Removal from the Project

If a worker demonstrates willful and repeated violation of company policies regarding health and safety, despite repeated warnings including verbal and written, the worker shall be removed from the project. All decisions in this regard are final and at the discretion of the Unger Construction Superintendent.

Follow up Post Discipline

After issuing discipline the supervisor and the Unger Construction Superintendent shall develop a monitoring program to ensure conformance to expectations and proper lines of communication are established and maintained. Supervisors the Unger Construction Superintendent and the worker need to agree that the necessary corrections have been made and the new behavior is consistently meeting expectations.