



## Proof of Training

Print name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

### INJURY & ILLNESS PREVENTION PROGRAM (IIPP)

#### BACKGROUND

California Code of Regulations, Title 8, "Construction Safety Orders", Section 1510 (CCR T-8 CSO 1510) and California Code of Regulations, Title 8, "General Industry Safety Orders", Section 3203 (CCR T-8 GISO-3203), Appendix A, requires construction employers to establish, implement and maintain an effective injury prevention program including, but not limited to, a written program for identifying and evaluating hazards; procedures for correcting unsafe conditions; a system for communicating with employees; regularly; scheduled safety meetings; employee training programs; compliance strategies; ongoing record keeping/documentation; and identification of a person responsible for the program.

#### POLICY STATEMENT

It is the policy of Unger Construction to maintain, insofar as it is reasonably within its control to do so, a workplace environment for employees and the general public that will not adversely affect their health and safety, nor subject them to avoidable risks of accidental injury or illness. No employee will be required to perform any task which is determined to be unsafe or unreasonably hazardous.

In accordance with this policy Unger Construction will provide facilities and equipment that meet all federal, state and local (where applicable) safety laws and regulations, and will institute and administer a comprehensive and continuous occupational "Injury & Illness Prevention Program" (IIPP) for all employees meeting the requirements and spirit of CCR T-8 CSO-1510 and CCR T-8 GISO-3203.

Even though overall responsibility for health and safety rests with Unger Construction, the immediate responsibility for workplace health and safety belongs to each employee who performs a supervisory role. With that said, individual employees are responsible for preventing accidents. Accordingly, all employees are to ensure that safe and healthful conditions and practices are provided and followed within the areas under their control, and all employees are to cooperate fully with all aspects of the health and safety programs of Unger Construction

In addition, contractors or subcontractors working under the direction of Unger Construction shall be required to comply with this program or demonstrate that they have a program that complies with California Code of Regulations, Title 8, and is an effective injury prevention program.

It is the policy of Unger Construction to follow original equipment manufacturers (OEM) recommendations for safe operation. Guards, covers, shields and other safety devices provided by the OEM shall remain in place and be fully functional for their intended purpose. Proof of scheduled maintenance is required when rental equipment is delivered to the jobsite. Equipment will not be operated in excess of 80% of the units rated capacity. In situations where the work would exceed 80% of the rated capacity the next larger sized unit shall be implemented. Some circumstances will require breaking down the load or decreasing the reach distance to remain below 80% of the rated capacity. Equipment cannot be modified without written permission from the OEM or a registered engineer.

Unger Construction does not perform the following activities; electrical work, permit required confined space, asbestos, lead, welding or hazardous waste disposal. Asbestos, lead activities and hazardous waste disposal will be performed under contract to the client directly, not as a subcontractor to Unger Construction. Electrical work, permit required confined space and welding will be handled under subcontract to Unger Construction.

## **GOALS**

Implementation of this "Injury & Illness Prevention Program" will assist Unger Construction in determining what hazards exist in the workplace, how to correct hazards that are identified, and what steps to take to prevent them from recurring. When properly implemented, the following goals can be achieved:

1. Employees will receive general safety and health rules which are written and apply to everyone.
2. Employees will receive specific training regarding healthful work practices for each specific job they may perform.
3. Employees will know how to report potentially hazardous conditions, without fear of reprisal, and that their reports are given prompt and serious attention.
4. Supervisors will be able to identify and correct many hazards through regular inspections.
5. Procedures will be implemented to investigate any workplace accidents, near-miss incidents, reported injuries and illnesses, and to correct any responsible hazards.
6. Disciplinary policies will be established which help ensure that safety rules and workplace procedures are put into practice and enforced.

## **RESPONSIBILITIES**

### IIPP Administrator

Dave Simpson, Safety Director for Unger Construction, is responsible for overall administration of the IIPP. He is responsible for all facets of this program and has full authority to make necessary decisions to ensure success of this program. He is the sole person authorized to amend these instructions. The IIPP Administrator has the following specific duties:

- To identify and evaluate workplace hazards; to include procedures for investigating occupational injuries and illnesses.
- To implement the methods and procedures for correcting unsafe and unhealthy conditions and work practices set forth in this IIPP, and to review and amend these methods and procedures as needed.
- To select appropriate supervisory personnel to be trained as Field Safety Supervisors, and to arrange for their training in first aid and CPR and to provide them with first aid kits and other necessary supplies. In general, Field Safety Supervisors shall be worksite Superintendents, Foremen, and Project Managers or their designees in the employ of Unger Construction.
- To implement a training program directly and by delegation to Managers, Superintendents and Field Safety Supervisors that will educate employees on general and specific safety and health practices for the company and for individual job assignments.
- To implement procedures for communicating company safety and health rules and procedures to employees in a clear and understandable manner as set forth in this IIPP and the Code of Safe Practices.
- To ensure compliance with safe and healthy work practices by enforcing directly and by delegation to Managers, Superintendents and Field Safety Supervisors the procedures for discipline set forth in this IIPP.
- To maintain in a proper and accessible manner records on training, accident investigations, corrective measures, and other matters pertaining to the implementation of this IIPP and other Cal/OSHA-required programs.
- Ensure that Cal/OSHA is informed in a timely manner (within eight (8) hours) in the event of a serious illness, injury or job-related fatality.

## Company Management (Board of Directors)

The Company Management shall have ultimate responsibility for implementing the IIPP. To meet this responsibility the Company Management shall:

- Empower the IIPP Administrator with sufficient authority to implement the IIPP including authority to arrange for training, make equipment purchases necessary to implement and operate the program, and amend the IIPP as needed.
- Ensure employee participation in the IIPP and all other company safety and health policies and programs by implementing the program enforcement portion of the IIPP.
- Company Management shall participate in or provide training in company health and safety matters.
- Company Management shall ensure that all personnel comply with the safety program, the company safety policies, Cal/OSHA regulation, and take any disciplinary actions necessary to enforce compliance with them.
- Designate a competent person for each jobsite or provide the authority to others to designate the responsible of a competent person based on their training and experience.
- Approve and enforce safety policies and procedures.
- Establish, approve, and enforce the responsibilities set forth in the Unger Construction IIPP and other company policies.

## Project Managers

Project Managers shall have primary responsibility for assuring that safety is maintained at the jobsite and ensuring that the terms of the IIPP are complied with by the field personnel. Project Managers shall have the following specific duties:

- To assist and ensure that regular inspections are done to identify workplace hazards, hazards are corrected, and to assist in the training of employees in matters of health and safety. All hazards requiring correction will be corrected as soon as practicable.
- To ensure that all employees are performing their responsibilities as set forth by the IIPP.
- To identify a competent person for each jobsite and make sure the competent person performs his/her duties correctly.
- To ensure that all jobsite personnel know the location of emergency medical services and know the procedures for reporting accidents, injuries, and near misses.
- In the event of a jobsite medical emergency, to assess the nature of the emergency, assist in obtaining professional medical services if the injury cannot be controlled by simple field first aid, investigate the incident, and make sure all documentation is completed and forwarded to the Safety Manager immediately. The Project Manager shall have the responsibility to ensure that a project supervisor escorts an injured worker to the medical treatment facility.
- To ensure compliance with safe and healthy work practices by enforcing directly and in consultation with management the procedures for discipline set forth in this IIPP.
- Identify and report to management any training or equipment needed by the field personnel to perform their work safely.
- To ensure that jobsite safety huddles and toolbox meeting are performed on site as required. The Project Manager shall attend, as possible, all toolbox meetings.
- To ensure that all documentation related to safety not mentioned above is completed and forwarded to the Safety Manager as required by company policy.
- Ensure that the all site posting requirements are met and postings are maintained and in a place frequented and accessible to all employees on site. The Project Manager, Superintendent or Foreman are responsible to ensure that all employees on site know the location of the employee postings and notices.
- To ensure that contractors and subcontractors comply with Unger Construction health and safety practices whenever they are working under the direction of Unger Construction. The responsibility for assuring that subcontractors comply with OSHA regulations and the Unger Construction health and safety practices includes the responsibility to discipline and / or remove any subcontractor from the site due to noncompliance.
- Responsible to oversee the development and implementation of a Job Hazard Analysis (JHA) as needed to ensure the safe planning of work and the elimination of hazards.

## Superintendents and Foreman

The Superintendents and Foremen are responsible for safe work procedures within his/her scope of authority and work area. Each Superintendent and Foreman shall be accountable for the safety of employees working under his/her supervision. The Superintendent and Foreman shall be responsible to perform the following duties:

- The Superintendents or Foremen shall make frequent inspections of the work area and equipment. Corrections of safety hazards on site shall be done as soon as practicable.
- The Superintendents or Foremen shall instruct all employees on the recognition and avoidance of hazards.
- The Superintendents or Foremen shall enforce the Company Code of Safe Practices, IIPP, and all other company safety polices on the jobsite.
- The Superintendents or Foremen shall conduct “toolbox” safety meeting at least once every other week, every 10 work days.
- The Superintendents or Foremen shall ensure that the competent person duties are performed to identify specific hazards and that prompt corrective measures are taken to correct them.
- The Superintendents or Foremen shall maintain first aid kits and any other safety-related items as shall be provided to them.
- The Superintendents or Foremen shall make sure that all employees under their control are aware of the location of first aid kits, the IIPP, and other safety related items at the jobsite.
- The Superintendents or Foremen are responsible for obtaining professional emergency medical services or providing emergency communications using their radio/cellular telephones as required during a medical emergency. In the event of a jobsite medical emergency, to assess the nature of the emergency, assist in obtaining professional medical services if the injury cannot be controlled by simple field first aid, investigate the incident, and make sure all documentation is completed and forwarded to the Safety Manager immediately.
- The Superintendents or Foremen are responsible to report accidents, injuries, or near misses to the Safety Manager immediately upon occurring unless the circumstances will not allow, but in all cases at the first opportunity following an incident.
- The Superintendents or Foremen are responsible to ensure that subcontractors comply with Unger Construction health and safety practices whenever they are working under the direction of Unger Construction. The responsibility for assuring that subcontractors comply with OSHA regulations and the Unger Construction health and safety practices includes the responsibility to discipline and / or remove any subcontractor from the site due to noncompliance.
- The Superintendents or Foremen are responsible, with the assistance from the Project Manager or the Safety Director, for the development of the Job Hazard Analysis (JHA) and the implementation of measures set forth in the JHA to eliminate the hazards associated with certain work activities. JHAs will be developed according to company policy and as requested by Management, the Project Manager, or the Safety Director.

## Employees

Employees are responsible for complying with the IIPP and all other company health and safety policies. To meet this responsibility, employees shall perform the following duties:

- Employees are to read and understand the Code of Safe Practices and familiarize themselves with the general and specific safety and health practices of the company and of their individual job assignments.
- Employees shall participate in training as requested, learn and obey safety practices and rules, and use proper safety devices and protective gear.
- Employees must correct or inform their supervisor about all safety, health and fire hazards upon discovery. Employees will not be dismissed or discriminated against for informing supervisors about potential worksite hazards. If there is any doubt about a health or safety matter, employees have a duty to talk it over promptly with their direct supervisor. In the event that the matter is not attended to in a timely manner, the employee is empowered to inform the safety Director directly.
- Employees are directed to immediately report any accidents, injuries, or near misses to their supervisor.

## COMMUNICATION OF SAFETY AND HEALTH MATTERS

Matters concerning safety shall be communicated to employees by but not limited to: written documentation, staff meetings, formal and informal training and postings.

It is the policy of Unger Construction to encourage employees to promptly report any existing or potentially hazardous condition to their supervisor, company management, or to the Safety Director. Such a report from an employee to management about unsafe or unhealthy conditions may be verbal, by presenting their Stop Work Card or the employee may use email/text communication. Employees and subcontractors that would prefer to remain anonymous can utilize the Hotline by calling (855) 400-6002 for English speaking operators, (800) 216-1288 for Spanish speaking operators or [www.lighthouse-services.com/ungerconstruction](http://www.lighthouse-services.com/ungerconstruction). Any employee who makes such a report shall not be disciplined or suffer any form of reprisal for so doing.

Lessons Learned communications will be distributed after a near miss, accident, incident or injury. These communications will be distributed by the Safety Committee after they have been thoroughly investigated. Additionally, Lessons Learned communications will be distributed when employees or subcontractors have been found role modeling safety excellence.

The results of the investigation of any employee safety suggestion or report of hazard will be communicated to all employees affected by the hazard by written documentation, staff meetings or safety meetings. Clear communication is a requirement. If necessary, training and documentation may have to be conducted in more than one language. Interpreters will be provided as needed.

## IDENTIFICATION AND EVALUATION OF WORKPLACE HAZARDS

- The IIPP Administrator or his/her appointed designee(s), Project Engineers, Project Managers, Superintendents, and Foremen shall conduct inspections and investigations to identify unsafe work conditions and practices.
- The IIPP Administrator or his/her appointed designee shall conduct regular company-wide jobsite inspections.
- The IIPP Administrator, his/her appointed designee, and/or a Project Manager, Project Engineer, Superintendent or Foreman shall conduct an inspection whenever new substances, processes, procedures or equipment are introduced into the workplace which represent a new occupational safety and health hazard.
- The IIPP Administrator, his/her appointed designee, and/or Project Manager, Project Engineer, Superintendent, or Foreman shall conduct an inspection whenever they are made aware of a new or previously unrecognized hazard.
- The IIPP Administrator, and/or his/her designee may conduct random inspections at their discretion.
- Results of periodic inspections shall be communicated via Lessons Learned.

## CORRECTION OF UNSAFE OR UNHEALTHY CONDITIONS

### Stopping Unsafe Work and Reporting Violations.

It is the responsibility of every employee to promptly stop and/or report any activity that violates our safety policies, procedures or regulations or does not look right, feel right, seem right or sound right. Below are just a few ways to stop or report violations:

- Employees can stop the work by voicing their concern to anyone they believe violates of our safety requirements.
- Employees can stop the work by presenting their Stop Work Card.
- Employees can report their concerns to their supervisor, their project's Safety Manager or Unger's Director of Safety.
- Employees can report an incident anonymously, via *Lighthouse*. Each employee has free, unlimited access 24 hours a day, 7 days a week to our third-party anonymous and confidential incident reporting system, via the

internet [www.lighthouse-services.com](http://www.lighthouse-services.com)/ungerconstruction or by calling (855) 400-6002 for English speaking operators, (800) 216-1288 for Spanish speaking operators.

### Stop Work Card

Unsafe conditions and unsafe behaviors will be corrected immediately via the Stop Work Card. Stop Work Cards can be presented by anyone on the project regardless of their trade affiliation, employer or contract status.

### Documentation

Examples of Stop Work Card activity and other Lessons Learned will be distributed monthly from the Safety Committee.

### Protection of Employees That Stop or Report Violations

Unger Construction will not tolerate any retaliation against person who stops or reports safety issues or concerns. If the report is anonymous the identity of employee who reported suspected safety violations will be treated as confidential and no reprisal may be taken against them. Confidentiality will be maintained to the extent possible, although in some cases limited disclosure may be necessary to effectively conduct an investigation. Any retaliation will itself be considered a violation of our Ethics Policy. Unger Construction will take disciplinary action against any supervisor or employee who initiates such a reprisal.

## **HAZARD CONTROL AND MITIGATION**

### a. Engineering

Engineering controls will be used first to eliminate or minimize unsafe or unhealthy work conditions. Such controls may include, but are not limited to: 1) substitution of materials; 2) modification of processes or procedures; 3) isolation of hazards with enclosures; and 4) application of increased general or spot ventilation.

### b. Administrative

If engineering controls are impractical or infeasible, administrative controls will be used. Such controls may include, but are not limited to: 1) rotation of employees through jobs entailing exposure to hazards so as to reduce individual exposures; 2) isolation of the hazard in time (operation during non-peak hours) or space (restricted access); and 3) enforcement of general workplace cleanliness habits.

### c. Personal Protective Equipment

If engineering controls alone, or in combination with administrative controls are inadequate to correct the hazard, the use of personal protective equipment shall be considered.

## **DESCRIPTION OF TRAINING**

### Introduction

Workers are given initial safety training when they are hired; during the safety orientation they receive an overview of our safety expectations, program elements and personal protective equipment. When they arrive at the jobsite workers will be given a site specific orientation for that job site. Additional training will be provided as job conditions dictate. Instruction of the safety training may be accomplished in several different ways; using an experienced supervisor, a safety representative, or outside resources. Each situation is unique and must be evaluated individually. As roles and responsibilities change due to professional development or advancement within the organization employees will receive training to inform them of their new responsibilities.

## Existing Training/Certification

When workers are hired or rehired they will be asked to present proof of existing training for example certification cards or course completion certificates should present their records such that the training database can be updated. For example: Forklift, Scissorlift, Boomlifts, CPR / First Aid, Respirators, Confined space, Scaffolding, Elevated work - Fall protection, Electrical work, Control of hazardous energies, Arc Flash, Excavation / trenching, Traffic control-flagger, Powder actuated tools, Rigging, Asbestos, Lead, or Mold. The aforementioned programs require specialized training and cannot be performed without this training. Additionally, many of these programs have refresher or renewal training requirements. Which means your certification cards must be current. If you have previously had the training but have either lost your records or your certification cards have expired you are not allowed to perform the work. Before you can perform the work you will need to be retrained or recertified.

### Confirmation of Existing Training                      Detailed Review Records/Certification Cards

Forklift	Scissorlift	Boomlifts
CPR / First Aid	Respirators	Confined space
Scaffolding	Elevated work	Fall protection
Electrical work	Control of hazardous energies	Arc Flash
Excavation / trenching	Traffic control/flagger	Powder actuated tools
Rigging	Asbestos	Lead
Mold	Other	Other

## General Information

The majority of our training is instructor lead, though computer based training is utilized. Instructors are typically the Director of Safety, Project Managers, Superintendents or Foremen. Professional development courses are conducted by outside consultants or Union representatives. Additionally, employees can also attend training offered by organizations such as Sacramento Region Builders (Safety Expo), Association of General Contractors (AGC) as well as training offered by the unions.

Training can be summarized into the following categories

- 1) New employees.
- 2) Employees or subcontractors given new assignments.
- 3) Whenever policies/procedures/regulations have been refreshed.
- 4) Periodic or Just in Time refresher training.
- 5) Continual training such as Tailgate meetings.
- 6) Professional development such as Leader Builder training. (Accountability, Communication, Supervision/Management)
- 7) After a near miss, incident or an injury or performance below expectations. (Lessons Learned)
- 8) Recognition for role modeling safety excellence. (Lessons Learned)
- 9) Site specific orientations.
- 10) Partnerships with Agencies and Trade Organizations

## New employees

Receive training and instruction on Unger's Safety Culture and code of safe practices via an orientation process. The orientation provides training and reinforcement of established safe work practices, policies, and procedures. The new employee orientation solidifies the relationship with the safety team and the safety culture of the company.

When new craft employees arrive, after being dispatched from the union hall, they receive the orientation mentioned above. At the conclusion of the orientation craft employees are asked to provide proof of existing training, certification cards or course completion certificates. This serves multiple purposes: a) to include their existing training

records into our training database. b) to ensure supervision is aware of their existing training c) to ensure their training certifications have not expired. d) to ensure the employees fully understand that if they have lost their training records or their certifications have expired they are not allowed to perform the work until they have been retrained or recertified.

Training records for all employees are kept in a database that can be viewed on the “S” drive. This enables the supervisory personnel to ensure the workers they would like to assign to a task have indeed received the proper training and that their certifications are current.

#### Employees given new assignments

Generally speaking this training is provided at the jobsite by the superintendent or foreman. Safe work practices or job hazard analysis are developed and reviewed before workers engage in a new activity or assignment.

#### When regulations /policies or procedures are refreshed

Employees and subcontractors will receive training either at their jobsite or the main office. This training is provided by the Director of Safety or a Safety Manager.

#### Periodic or Just-in-time refresher training

Is conducted as situations dictate, for example Heat Illness prevention typically kicks off in the month of April and continues every other month through September. As projects near a milestone that could change the typical hazards awareness or refresher training is provided. This training is provided for the existing staff members and becomes integrated into the site orientation to ensure that all hands on the project are fully aware of the changes and the expectations.

#### Continual training such as tailgate meetings

Are conducted every two weeks and include all hands on the jobsite. These training classes are typically calendared however; each jobsite has the flexibility to insert materials that are timely and relevant to their project.

#### Professional development

Classes also known as Leader Builder classes are conducted by outside consultants or Union representatives and are offered to project managers, project engineers, superintendents, foreman and soon to be foreman.

#### Lessons Learned

Communications are designed to share positive experiences as well as experiences that are below expectations. These communications are distributed by the Safety Committee to all employees typically every month. They occur after a near miss, incident or an injury, performance below expectations or as recognition for role modeling safety excellence. The Lessons Learned communications can take the place of tailgate meetings to ensure the subcontractors are not excluded from learning.

#### Site specific orientation/training

For employees, subcontractors new to a jobsite. Unger Construction conducts a site specific orientation for all subcontractors, vendors and support personnel prior to granting access to the job site. This orientation communicates the property owner’s expectations as well as Unger Construction’s expectations. This orientation is conducted by supervisory personnel in a face-to-face format to ensure each worker fully understands the expectations. Orientations



play a critical role in the integration of new employees or subcontractors into a new project. The orientation establishes Unger Construction's values and prepares the worker for a successful and safe job performance. Site specific hazards, safe work practices, emergency procedures, stop work cards, injury reporting and customer/client expectations are covered during the orientation. On small jobs the orientation is typically performed by a foreman or superintendent. On large jobs, the orientation is administered by the Unger Superintendent or Safety Manager. On some client sites workers are required to read their "Contractor Services/Vendors Personnel Safety Handbook" and sign an acknowledgement form.

### Supervisory Personnel

The IIPP Administrator shall ensure that all Field Safety Supervisors receive training to familiarize themselves with the safety and health hazards to which employees under their immediate direction and control may be exposed. All Managers, Project Managers, Project Engineers, Superintendents, and Foremen are responsible for seeing that those under their direction receive training on general workplace safety and specific instructions with regard to hazards that are unique to their work area or any job assignments under their supervision.

## **INJURY AND ILLNESS INVESTIGATION**

### Accident and Near Miss Process

Accidents, Near Misses and Incidents are investigated by the leadership of the project team where the incident took place, typically involving the project manager and the superintendent. The process includes a first alert communication to the Safety Director or the Vice President of Operations. First alerts can be a quick phone call, text or email message. Once the situation has been stabilized the project team will conduct an incident investigation. The purpose of the incident investigation is to determine the root cause and the various contributing factors. Incident reports are submitted to the Safety Director. The Safety Director reviews the reports with the Vice President of Operations and the Director responsible for the area in which the incident occurred.

Additionally, the incident reports are reviewed by the Safety Committee where they are converted to Lessons Learned communications. Lessons Learned exercises are not focused on placing blame; they are focused on admitting our short comings, celebrating our successes and putting proper measures in place. Every lesson learned exercise has a management system component, physical component and human component thereby ensuring blame cannot be inadvertently placed on anyone and to demonstrate that opportunities for improvement reach to all levels of the organization.

When a safety concern arises, a root cause analysis is performed and contributing factors determined. Unger's Senior Executives act as a filter, thereby removing stress from the situation. The intent of the exercise is for the entire organization to learn, with the focus on identifying wrong decisions while maintaining team harmony. The key to our success is how we handle failures and mistakes; getting over them fast, not dwelling on them and not letting others dwell on them.

Lesson learned presentations ensure proper communication of the successes, opportunities for improvement and gap closing actions throughout the entire organization therefore everyone learns, not just those that had personal or direct exposure to the incident.

Gap closing actions follow the "SMARTER" format: Gap closing actions are Specific, Measurable, Achievable, Realistic, Timely, Effective and Regularly Reviewed. This practice ensures we are focusing our continuous improvement efforts appropriately and will receive a true benefit from our efforts.

Whenever accidents, injuries, or illnesses occur on the job regardless of the severity of the injury will be thoroughly investigated using the "Root Cause Investigation Form.

## Minor Injuries

Minor injuries incurred on the job will be reported to the immediate supervisor of the injured employee. The supervisor will report the incident to the IIPP Administrator, who will keep "Root Cause Investigation Form" with a record of hazard abatement action on file. All First-aid injuries are included as minor injuries and shall be reported to the supervisor and IIPP Administrator.

## Serious Incidents

Serious occupational injuries, illnesses or exposures to hazardous substances, as defined by Cal/OSHA, must be reported to the IIPP Administrator immediately after they become known. The IIPP Administrator will contact Cal/OSHA as required by law.

The incident will be investigated using the "Root Cause Investigation Form". Hazard abatement steps will be conducted as quickly as possible.

## **Cal/OSHA Notification in Event of Serious Illness, Injury or Work-Related Death**

### Employer Obligations

CCR T-8 GISO 342(a) requires an employer to submit a report to the nearest Cal/OSHA district office if any of the following occur: 1) an employee is seriously injured on the job or in connection with the job; 2) an employee suffers a serious job-related illness; or 3) an employee dies on the job or in connection with it.

An injury or illness is defined as "serious" if: 1) the employee is hospitalized for more than twenty-four (24) hours for reasons other than medical observation; or 2) an employee loses any part of the body or suffers permanent disfigurement.

The employer must make the report as soon as practically possible, but not longer than eight (8) hours after the employer knows, or with diligent inquiry could have known, of the death, serious illness, or injury. The employer may make the report by telephone, telegraph or fax. The report must include the following information; 1) time and date of accident; 2) employer's name, address and telephone number; 3) name and job title or badge number of the person reporting the accident; 4) address of location where accident or event occurred; 5) name of person to contact at the accident site; 6) name and address of the injured employee(s); and 7) the nature of injury(s).

### Procedure to Be Followed

In the event of a serious illness, injury or jobsite fatality, the supervisor present will inform the IIPP Administrator *as quickly as practically possible*. The IIPP Administrator should be contacted immediately after professional medical services have been successfully procured.

The IIPP Administrator shall prepare a report for submission to Cal/OSHA that includes all of the information required as explained above, using whatever means are necessary including but not limited to receiving an oral report from the Field Safety Supervisor and visiting the site of the incident to interview witnesses and the injured employee.

The IIPP Administrator shall strive to gather as much additional information as possible, including but not limited to the evaluation report of an occupational physician and an evaluation of worksite conditions which may have contributed to the incident. *However, the IIPP Administrator must report the incident to Cal/OSHA within eight (8) hours to avoid substantial penalties.* Depending upon the severity of the incident, the IIPP Administrator may elect to report to Cal/OSHA by telephone, or by fax report.

District offices are located as follows:

1. Anaheim 2100 East Katella Av., Anaheim 92806, 714-939-0815, Fax 714-939-0815
2. Concord, 1465 Enea Cir, Bld. E, Concord 94520, 925-602-6517, Fax 925-676-0227
3. Foster City, 1065 East Hillsdale Blvd, Foster City 94404, 650-573-3812, Fax 650-573-3817
4. Fremont, 39141 Civic Center Dr., Fremont 94538, 510-794-2512, Fax 510-794-3889
5. Fresno, 2550 Mariposa St., Ste. 4000, Fresno 93721, 559-445-5302, Fax 559-445-5786
6. Los Angeles, 320 West 4<sup>th</sup> St., Ste. 850, Los Angeles 90013, 213-576-7451, Fax 213-576-7461
7. Modesto, 1209 Woodrow, Ste. C-4, Modesto 95350, 209-576-6260, Fax 209-576-6191
8. Oakland, 1515 Clay St., Ste. 1301, Oakland 94612, 510-622-2916, Fax 510-622-2908
9. Monrovia, 750 Royal Oaks Drive, Ste. 104, Monrovia 91016, 626-256-7913, Fax 626-359-4291
10. Sacramento, 2424 Arden Way, Ste. 165, Sacramento 95825, 916-263-2800, Fax 916-263-2798
11. San Bernardino, 464 W. 4<sup>th</sup> St., Ste. 332, San Bernardino 92401, 619-383-4321, Fax 909-383-6789
12. San Diego, 7575 Metropolitan Dr., Ste. 207, San Diego 92108, 619-767-2280, Fax 619-767-2299

#### If the IIPP Administrator Is Unavailable

It is imperative that Cal/OSHA be informed in a timely manner. If the IIPP Administrator is unavailable, Cal/OSHA should be informed by the Company District Manager or Assistant District Manager. Contact information for Cal/OSHA is shown above in paragraph b of this section.

#### **RECORDKEEPING / MAINTENANCE OF RECORDS**

The IIPP Administrator or appointed designee shall keep all records pertaining to the IIPP including the following:

##### Hazard Abatement Actions

Complete written records of reported safety hazards, hazard assessments, and hazard abatement actions including the name(s) of the person(s) involved. These records shall be maintained for three (3) years.

##### Accident Investigations

Complete written records of accident investigations, including the name of the person(s) conducting the investigation, the unsafe conditions and work practices that have been identified, and action taken to correct the identified unsafe conditions and work practices. It is recommended that these records be maintained for seven (7) years.

##### Employee Training

Written documentation of safety and health training attended by each employee, including employee name or other identifier, training dates, type(s) of training and training providers. This documentation shall be maintained for three (3) years.

##### Job Hazard Evaluations

Job Hazardous Evaluations are kept with specific project files or on the Safety Shared drive.

#### **PROGRAM ENFORCEMENT (Compliance with Expectations)**

##### Process for Ensuring Safety and Health Rules are Complied With

Jobsite visits by the Safety Director and the Vice President of Operations to ensure safety policies and procedures are being followed occur on a regular yet unscheduled basis. The purpose of the unscheduled/unannounced

visits it to observe the jobsite staff performing as they would be any day of the week. These safety visits include informal discussions with the project management staff and field workers before, during and after the jobsite is toured. This practice demonstrates how our executives are accessible and in tune with the challenges employees and subcontractors face. The Vice President of Operations and the Safety Director visit the sites separately and without coordination. Job site audit findings are corrected on the spot and are shared with the field level leaders for inclusion in daily safety communications. Sites that are found to have opportunities for coaching, mentoring or development will receive consecutive follow up visits by the Safety Director, until it can be demonstrated that the desired behavior has returned.

Unger Construction has high expectations and requires safety excellence for each employee, crew, construction project and for our entire company. Every employee must adhere to our safety policies, procedures and be in full compliance with applicable governmental laws, rules and regulations. Employees 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 expects every employee to observe safety rules established for employee 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 employee and their fellow workers.

Unger Construction may find it necessary to apply discipline or corrective measures if an employee 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 an employee.

Discipline will be applied fairly and fit the circumstances. The seriousness of the offense, the employee'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 termination. 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 termination.

Each incident will be investigated with absolute honesty and integrity. To ensure balance, each incident will be investigated by the workers 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 termination. If the allegations are confirmed a formal session will be conducted with the employee and the members of investigation team. The findings and corrective actions will be documented and presented to the employee 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 an employee, such as conduct that endangers the well-being of other employees may render an employee ineligible for rehire.

## **EMPLOYEE PERFORMANCE REVIEW**

Annual performance evaluations have the following categories: Job Knowledge, Problem Solving, Decision making, Planning/Organization, Communication, Interpersonal skills/team work, Safety, Personal Leadership /Accountability and Flexibility.

## **SAFETY AWARDS AND INCENTIVES**

### Safety Awards

Unger Construction is a member of Cal OSHA's Voluntary Protection Program (VPP) and is one of only 14 contractors in the State of California to have achieved this prestigious recognition from Cal OSHA.

### Reward & Incentive System

Members of the VPP are prohibited from having safety incentives. Therefore our safety incentive program was terminated in order for us to comply with VPP. With that said we do have a reward and recognition program for employees and subcontractors.

Unger Construction utilizes a public and private recognition system for employees and subcontractors that role model safety expectations. The public recognition comes in the form of the Company Newsletter. The private recognition comes in the form of the letters home. Most employees receive both however some employees prefer the private recognition system.

When an employee or subcontractor presents their "Stop Work Card", Mike Mencarini, company President sends a thank you letter to the home of the employee or to the subcontractor's office. The letter briefly describes the event and expresses sincerest gratitude that the employee is role modeling safety excellence. We send the letter home to share the recognition with the employee's actual family to further demonstrate that safety excellence is about people. We send the letter to the subcontractor's office to provide recognition for the employee and to demonstrate that with respect to safety we are one large extended family.

## **DESCRIPTION OF SELF-INSPECTION PROCESS**

Unger Construction is a team centered, learning oriented organization that promotes safety excellence through, awareness, empowerment and participation at all levels. Safety excellence at Unger Construction is defined as planning and executing our work with a passion for preventing injuries. Additionally, safety excellence includes: looking out for each other's safety; stopping and correcting unsafe acts or unsafe conditions on the spot. As well as coaching and developing those that are less safety savvy. Employees and subcontractors understand that the expectation is to eliminate injuries, not to hide them. Hiding injuries provides the illusion of safety excellence. We want Unger Construction and our subcontractors to achieve safety excellence. In order to achieve safety excellence, you need total commitment from the top down, the bottom up and both ways from the middle of our organization. In fact, we believe the truest measure of safety excellence is when peer to peer observations correct unsafe work behaviors and unsafe conditions without the need for management intervention.

During their jobsite safety orientation, subcontractors are made aware of our "Stop Work Card" program. The focus of the Stop Work Card is on changing behavior, not punishment. The primary purpose of the Stop Work Card is to allow people to freely stop unsafe activities from proceeding or happening at all. The secondary purpose is to eliminate undesirable behavior and to correct unsafe conditions.

Anyone can present our Stop Work Card, anytime there is a safety concern. 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.

Subcontractors frequently comment they are surprised and pleased to learn that they are empowered to stop any work activity that concerns them. They recognize Unger Construction views our subcontractors as partners and truly value their opinions.

It is the responsibility of every employee or subcontractor who knows of any activity that violates our safety policies, procedures or may be in violation of regulations, to report such activity promptly. Employees can report their concerns to their supervisor, the projects safety manager or to the Director of Safety. If the employee would like to remain anonymous every employee has free, unlimited access to our third-party anonymous and confidential incident reporting system, *MySafeWorkplace*. This beneficial service is available 24 hours a day, 7 days a week via a toll free number, 800-461-9330, or the internet at [www.MySafeWorkplace.com](http://www.MySafeWorkplace.com).

#### Protection of Employees Who Report Safety Concerns.

Unger Construction will not tolerate any reprisals against persons who report safety issues and concerns. The identity of employees who report suspected safety violations will be treated as confidential and no reprisal may be taken against them. Confidentiality will be maintained to the extent possible, although limited disclosure may be necessary in some cases to effectively conduct an investigation. However, any reprisal will itself be considered a violation of our Code of Ethics. Unger Construction will take disciplinary action against any supervisor or employee who initiates such a reprisal.

Stop Work Card deployments are shared with the Director of Safety. The safety director informs the president and vice presidents. Personalized thank you letters describing the actions taken by the employee are sent to the homes of the employees so their family members can appreciate how much Unger Construction appreciates employees that role model safety excellence. For subcontractor letters are personally delivered by our Safety Director to the Principals and Safety Director for the subcontractor's organization. (See Appendix)

In addition to the employee empowerment self-inspections our superintendents and foreman perform safety inspections throughout the work day. Our Safety Director and the Vice President of Operations visit the jobsites every other week, in essence insuring each jobsite is visited by a member of the Strategy Team once per week.

Safety and health complaints are typically handled peer to peer via the Stop Work Card program. However, concerns or complaints can be brought to the attention of the Superintendent, Project Manager, a member of the Strategy Team, the Director of Safety or a member of the Safety Committee. Complaints can also be provided anonymously via our hotline. This beneficial service is available 24 hours a day, 7 days a week via a toll free number, 800-461-9330, or the internet at [www.MySafeWorkplace.com](http://www.MySafeWorkplace.com). Complaints logged into the hot line are processed by the Code of Ethics Committee (Director of Finance, Director of Human Resources, and the Director of Safety).

#### **DISCIPLINARY PROCESS**

Unger Construction has high expectations and requires safety excellence for each employee, crew, construction project and for our entire company. Every employee and subcontractor must adhere to our safety policies, procedures and be in full compliance with applicable governmental laws, rules and regulations. Employees 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. Employees or subcontractors found performing work in an unsafe manner that would endanger the employee or another employee shall be subject to discipline or termination.

Unger Construction expects every employee and subcontractor 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 employee and their fellow workers.

Unger Construction may find it necessary to apply discipline or corrective measures if an employee or subcontractor 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 an employee.

Discipline will be applied fairly and fit the circumstances. The seriousness of the offense, the employee'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 termination. 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 termination.

Each incident will be investigated with absolute honesty and integrity. To ensure balance, each incident will be investigated by the workers 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 termination. If the allegations are confirmed a formal session will be conducted with the employee and the members of investigation team. The findings and corrective actions will be documented and presented to the employee 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 an employee, such as conduct that endangers the well-being of other employees may render an employee 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 termination. 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 termination.

##### 1. Verbal Warning

The first time a supervisor observes an employee not complying with the provisions of the Code of Safe Practices, the supervisor shall give the employee 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 or IIPP Administrator. Be advised that if the severity of the violation may have or had the potential to have endangered other employees, the general public, or company assets, the employee committing the violation may be terminated without a previous warning. This determination shall be made by the supervisor or IIPP Administrator in conjunction with the Vice President of Operations. All decisions in this regard are final and at the discretion of the supervisor, IIPP Administrator and the Vice President of Operations.

##### 2. Written Warning

If, after the verbal warning, a supervisor observes an employee still not complying with the provisions of the Code of Safe Practices, the supervisor shall give the employee a written warning that such behavior is in violation of company policy and is not to be tolerated.

##### 3. Time off with No Pay

If an employee continuous to not comply with the IIPP after receiving a verbal and written warning, the employee shall be suspended from working without pay for 3 days and requested to leave the jobsite.

#### 4. Termination

If an employee demonstrates willful and repeated violation of company policies regarding health and safety, despite repeated warnings including verbal and written, the employee shall be terminated.

#### **JOB HAZARD ANALYSIS PROCEDURE (JHA or SAFE WORK PLAN)**

Our PTP process is focused at the foremen and crew level so that the workers fully understand they are in a position of being responsible for their own well-being. This has the additional benefit of making safety an integral part of the work being performed, a natural component of performing the work. The program is focused on the foreman and their crew and is used even for low risk hazard tasks. JHA planning is done to ensure all crew members have a common understanding of the task at hand, the potential for injury and the methods used to control and reduce the potential for injury. The discussions are conducted by the foremen or lead person or in some instances by the person that is most familiar with the task at hand. All members of the work crew attend and initial the read and understood section. Members that arrive later need to go through the JHA and place their initials on the read and understood section.

#### Job Hazard Analysis (JHA's)

JHA's for moderate to higher risk activities for example Crane lifts, energized electrical work, developing a fall protection plan are typically completed by safety representatives, with involvement from the superintendents or project managers. Moderate to high risk activities should be identified in the 30 day look ahead giving plenty of time to develop an effective plan.

#### **PROGRAM, SYSTEMS, PROCEDURES TO ENSURE SUBCONTRACTOR WORK IS PERFORMED SAFELY**

Prior to onsite mobilization 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 employees 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 Premobilization Checklist for a complete listing of OSHA's required training.

All subcontractors are required to furnish to Unger Construction with a Job Hazard Analysis (JHA), safe work 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.

Performance expectations are managed via 10 – 15 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.

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.

Unger Construction has high expectations and requires safety excellence for each employee, crew, construction project and for our entire company. Every employee and subcontractor must adhere to our safety policies, procedures and be in full compliance with applicable governmental laws, rules and regulations. Employees 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. Employees or subcontractors found performing work in an unsafe manner that would endanger the employee or another employee shall be subject to discipline or termination.

Progressive disciplinary counseling is encouraged, beginning with a written warning, followed by a three day suspension without pay, followed by termination. However, the seriousness of some types of violations or other circumstances will necessitate elimination of some or all of the steps of progressive discipline. Repeat offenses, breaking the same rules, and multiple offenses, breaking more than one rule will be grounds for disciplinary escalation. Gross misconduct, such as egregious or conspicuously flagrant or objectionable behavior or actions by an employee, such as conduct that endangers the well-being of other employees may render an employee ineligible for rehire.

## **MEDICAL FIRST AID PROGRAM**

Unger Construction requires at least one worker per jobsite be certified as a first aid responder. First aid responders are trained in first aid and CPR. Injured employees will be evaluated by the first aid responder. Escalations in treatment will be determined by the first responder and the injured employee. Minor injuries will be treated by either the first responder or a contracted medical response team that is deployed to the jobsite. For moderate injuries the injured worker will be transported to the nearest occupational health clinic. Maps to the nearest clinic and all necessary medical forms are kept in "Grab -N-Go" binders on the jobsite. The foreman for the injured worker takes the binder with them to the nearest medical clinic. For serious injuries calls will be placed to 911. Unger Construction and the subcontractors will provide crowd control and direct/escort the responding emergency vehicles through the jobsite directly to the injured worker ensuring timely response and treatment.

Subcontractors are required to notify Unger Construction's Project Superintendent immediately of any injury, incident, accident or near miss. A written report identifying the root cause and the corrective measures to be taken to assure that the incident does not reoccur will be furnished within 24 hours. Subcontractor employees, including site supervision, the subcontractor's Safety Manager, and the employee's involved in the incident, will be required to meet with the Unger Construction's Safety Manager immediately following the publication of the written report.