

## **Subcontractor Management Plan**

### General:

All firms contracted by Pagoda Electrical, Inc., because they are employers, are required by the Williams-Steiger Occupational Safety and Health Act of 1970 to provide safe and healthy employment to their employees.

Pagoda Electrical, Inc. as an employer is also responsible for providing a safe and healthful work environment for its employees. Contract work, especially in occupied buildings, may present situations or conditions that may adversely impact on the safety and health of our Company employees.

This Subcontractor Management Plan is designed to protect Pagoda Electrical, Inc. and subcontractor employees, equipment and facilities from injury, accident or loss. Subcontractors are persons not directly employed by Pagoda Electrical, Inc. but who provide specific labor or services. The use of the term “Contractor” is interchangeable with “Subcontractor” within this safety chapter, and vice versa..

Examples of Subcontractor Employers are:

- Construction Companies
- Utility Service or Repair Companies
- Janitorial Services
- Equipment Repair Personnel
- Pest Control Services
- Vehicle and Machinery Mechanics
- Food Service and Vending Machine Services
- Transportation & Shipping Services
- Raw Product Suppliers

### Policy:

It is essential that subcontractors understand Pagoda Electrical, Inc.’ expectations and requirements up front in order to be fully prepared to meet them.

Understanding and complying with Pagoda Electrical, Inc.’s safety requirements are critical in ensuring a successful partnership between Pagoda Electrical, Inc. and its subcontractors.

Purpose:

The purpose of these submittal requirements is to ensure subcontractors interested in working for Pagoda Electrical, Inc. submit adequate documentation related to the programs, plans, and training in order to comply with Pagoda Electrical, Inc.'s own environment, safety, and health requirements. All subcontractors will be notified that all information they provide will be verified for accuracy.

As a condition of doing business with Pagoda Electrical, Inc., all subcontractors must comply with applicable local, state, federal regulatory requirements and Pagoda Electrical, Inc. safety procedures and policies. All subcontractors will be prequalified by Pagoda Electrical, Inc. by reviewing their safety programs, safety training documents, safety statistics and reports, EMR, OSHA Log 300's and reviewing and verifying the accuracy of the answers to and completion of the SUBCONTRACTOR SAFETY PREQUALIFICATION QUESTIONNAIRE and metric, next page

Certification:

As work history information on subcontractors is collected and accumulated over time, it becomes an invaluable resource for historical safety performance. This SUBCONTRACTOR SAFETY PREQUALIFICATION QUESTIONNAIRE becomes a centralized repository of information and presents a unique ability to evaluate each subcontractors based on their past work.

The criterion for selecting the best subcontractors for the job, based on appropriate and acceptable safety metrics, enhances and supports Pagoda Electrical, Inc.'s proactive stance on safety. This method of selection also enables Pagoda Electrical, Inc. to select the best subcontractor for the job in an unbiased and efficient way. If a subcontractors' State EMR (experience modification rate) is greater than 1.0, then their working with Pagoda Electrical, Inc. will be denied. Likewise, subcontractors that have "Unacceptable" line-items on the following SUBCONTRACTOR SAFETY PREQUALIFICATION QUESTIONNAIRE will not be considered qualified until such time the line-items are corrected. Unsafe subcontractors that see the "Unacceptable" on the following questionnaire may also decline to submit a bid, saving everyone's time.

Acceptable safety metrics are utilized and chosen, so that just the right amount of meaningful data is collected. Reviewing a subcontractor's safety trends and history helps Pagoda Electrical, Inc. to anticipate, predict and prevent incidents. Safety

metrics also show a subcontractors actual safety performance against their written policies. For the purpose of this Subcontractor Management Plan, Pagoda Electrical, Inc. uses the subcontractor's safety and health documentation, which includes, but is not limited to, logs, records, minutes, procedures, checklists, statistics, reports, analyses, notes, or other written or electronic document which contains information pertinent to the subcontractor's safety, health, environmental protection, and/or emergency preparedness.



## METRIC

**Office Use Only**

Acceptable
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**Not  
Acceptable**

2010:

Responsibilities:

All Pagoda Electrical, Inc. personnel responsible for managing contracts will ensure that:

1. Each subcontractor is provided with warnings of hazards and information about our Company programs for abating these hazards;
2. Each subcontractor is informed of our Company's safety, health, and environmental requirements; and
3. The work is conducted in a safe and responsible manner in compliance with applicable regulations and our Company's requirements.

Our Company's Contracting Officer will ensure that the contract language requires the subcontractor to:

1. Meet all applicable federal, state, and local environmental, health, and safety regulations and our Company's requirements;
2. Provide their employees with the necessary training, medical exams, and safety equipment;
3. Submit written comprehensive safety and health plan for the specific contract undertaken;
4. Comply with all applicable federal, state, and local regulations and our Company's requirements, with violation being grounds for default of the contract.

Our Project Contracting Officer will:

1. Communicate the contractual, statutory, and other environmental, health and safety requirements to the subcontractor prior to the start of the contract;
2. Ensure that the subcontractor's safety and health plan is submitted with their bid package;
3. Ensure that such requirements are addressed in the Request for Solicitation and/or contract paperwork; and
4. Ensure that such requirements are observed.
5. Upon receipt of a report of a noncompliance or any condition which poses a serious or imminent danger to health or safety, issue a request for immediate corrective action from the subcontractor.

Our Project Compliance Officer will, prior to the start of the contract, inform the subcontractor of the requirement to observe all environmental, health, and safety provisions specified in the contract, provided by statutes/regulations or otherwise required.

Our Project Compliance Officer and his/her representative will:

1. Ensure our Safety and Health Manager is provided with a copy of the subcontractor's written health and safety plan for review prior to the pre-construction meeting with the subcontractor.
2. Ensure our Safety and Health Manager is represented at all pre-construction meetings held with subcontractors.
3. Provide our Safety and Health Manager and our Security Officer with a tentative construction schedule for subcontractor's on-site and immediate written notification of changes.
4. Notify our Company's Management of the subcontractor work schedule, location, and special precautions or concerns prior to the start of the project.
5. Monitor the subcontractor's work performance and determine if subcontractor is complying with the contract health and safety plan and pertinent environmental, health, and safety regulations. Any questions regarding compliance with specific regulations should be referred to our Safety and Health Manager.
6. Ensure that all required permits are completed by the subcontractor and provided for review and signature of an authorized person and by our Safety and Health Manager
7. Notify our Safety and Health Manager immediately of construction accidents and provide our Safety and Health Manager with a copy of the subcontractor's accident reports.
8. Notify our Safety and Health Manager immediately of an OSHA complaint and/or inspection of subcontractor's job site.

Our Safety and Health Manager will conduct a pre-solicitation project review of the contract to ensure that all appropriate health and safety regulations and requirements and pertinent work site hazard information have been incorporated,

where necessary. Our Safety and Health Manager will document review of the plan and will note any areas of special concerns.

The Safety and Health Manager will review and monitor the subcontractor's adherence to its written health and safety plan and all applicable environmental, health, and safety requirements. The subcontractor is responsible for meeting all contractual agreements and for providing a safe and healthy workplace for its employees.

The subcontractor will:

- Provide for daily, frequent and regular safety inspections of the work sites, materials, and equipment by competent employees.
- Notify our Project Compliance Officer of construction accidents in a timely manner.
- Notify our Project Compliance Officer of any non-formal OSHA complaint notifications and/or OSHA inspection(s) of the job site.
- Identify and correct hazards
- Provide subcontractor employees with requires personal protective equipment
- Ensure subcontractor Employees have the proper training for assigned tasks
- Coordinate with our Project Compliance Officer for safety related issues
- Maintain required insurance coverage
- Establish and maintain an effective Safety and Health Program
- Establish and maintain an effective Housekeeping Program
- Program

**Minimum subcontractor Insurance Requirements-** Subcontractors and Vendors are required to meet minimum Insurance Requirements according to the following schedule:

**Coverage Minimum Per Occurrence Limits-**

- Automobile Liability \$ \_\_\_\_\_

- General Liability \$ \_\_\_\_\_
- Products Liability \$ \_\_\_\_\_
- Completed Operations Liability \$ \_\_\_\_\_
- Workmen's Compensation \$ \_\_\_\_\_

### **Certificates of Insurance**

Contractors must provide Pagoda Electrical, Inc. a Certificate of Insurance. The Certificate must list Pagoda Electrical, Inc., its Divisions and Subsidiaries as a Certificate Holder with notification of cancellation or non-renewal. Without the Certificate, Pagoda Electrical, Inc. may have to assume the liabilities and responsibilities for the subcontractor.

### **The Subcontractor Health and Safety Plan:**

When required by the contract, the subcontractor must develop and implement a comprehensive health and safety plan for his or her employees which covers all aspects of onsite construction operations and activities associated with the contract. This plan must comply with all applicable health and safety regulations and any project-specific requirements that our Company has specified. The subcontractor must provide our Contracting Officer with a copy of this plan with their bid package.

Acceptance of the subcontractor's health and safety plan only signifies that the plan generally conforms to the requirements of the contract. It does not relieve the subcontractor of the responsibility for providing employees with a safe and healthful work environment. This concept must be communicated to the subcontractor by our Contracting Officer and also incorporated into the contract document.

### **Pre-Construction Meeting:**

Representatives of the subcontractor shall meet with our Contracting Officer, Project Compliance Officer, and Safety and Health Manager. The purpose of the meeting will be to discuss our safety requirements and for the implementation of all health and safety provisions pertinent to the work under contract.



Our Safety and Health Manager will review the subcontractor's site specific safety and health plan with the subcontractor as well as review all required material safety data sheets (MSDS) submitted for proposed products to be used by the subcontractor.

Our Company is required by OSHA standards (most notably 29 CFR 1910.1200, Hazard Communication Standard) to provide information to subcontractors on the hazards present at the work site. This information will be made available to the subcontractor in the project specifications (pre-bid) as well as at the pre-construction meeting.

Our Safety and Health Manager will, during the pre-construction meeting, provide the subcontractor with copies of our Company's written procedures such as lockout/tagout, confined space entry and permit process, and other safety and health requirements that apply.

#### **Subcontractor Orientation and Training:**

Prior to entering Pagoda Electrical, Inc., ALL PERSONS that will be performing work must attend Pagoda Electrical, Inc.'s mandatory pre-job safety orientation and pre-job meetings and training brief(s). Subcontractor Managers shall coordinate and schedule the orientation with Pagoda Electrical, Inc.'s Safety and Health Manager in a timely manner for all personnel. The location for these pre-job meetings and safety orientation will be selected in advance after mutual agreement between Pagoda Electrical, Inc. and Subcontractor's Management. Subcontractors shall document employee attendance at all site specific safety orientations and pre-job meetings and make a copy available to Pagoda Electrical, Inc..

Conducting pre-job safety orientations with all workers ensures that all safety and health rules, regulations, policies, and procedures are understood and to provide an opportunity to bring forth answers to questions that personnel may have.

The pre-job meeting and safety orientation shall introduce new and old Subcontractor employees to, but not limited to, the following:

- Pagoda Electrical, Inc. safety and health policy and programs.
- The construction project and the employee's role within it.
- Hazard communication requirements.



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- Emergency procedures.
- Location of first aid stations, fire extinguishers, telephone, lunchroom, washroom, and parking.
- Site-specific hazards, including asbestos, lead hazards.
- Safety and health responsibilities.
- Reporting of injuries and hazardous conditions.
- Use of personal protective equipment.
- Tool handling and storage.
- Review of each safety and health rule applicable to the job.
- Introduction to safety and health representative(s).
- Introduction to supervisor.
- Site tour or map where appropriate.

### **Fire Prevention and Protection:**

The subcontractor shall prepare and carry out an effective fire protection and prevention plan, including provisions for the fire protection and suppression equipment set forth in this section. This plan shall be made part of the comprehensive safety and health plan submitted by the subcontractor with their bid package.

### **Housekeeping:**

Good housekeeping, with provision for the prompt removal and disposal of accumulations of combustible scrap and debris, shall be maintained in all areas of the job site. Self-closing metal containers shall be used for disposal of waste saturated with flammable liquids.

### **Codes and Regulations:**

The subcontractor shall comply with the requirements published in the current revisions of the National Electrical Code, National Electrical Safety Code, the National Fire Protection Association standards, and all other applicable Municipal Codes and Regulations.

### **Smoking:**

Smoking or other sources of ignition shall not be permitted in areas where flammable or explosive materials are stored or are present. All such areas shall be conspicuously posted: NO SMOKING OR OPEN FLAMES. There is a no smoking policy in effect within all Pagoda Electrical, Inc. facilities.

### **Fires:**

Fires and open flame devices shall not be left unattended unless protected with automatic temperature control and cutoff devices.

### **Cleaning and Degreasing:**

Gasoline and liquids with a flash point below 100 degrees Fahrenheit shall not be used for cleaning and degreasing.

### **Building Exits:**

All buildings, shops, and plant facilities in which employees are required to work shall have at least two well-marked and lighted exits. The two exits shall be arranged to minimize the possibility of both exits being rendered inaccessible by one fire or emergency condition.

### **Fire Extinguishers:**

Distinctly marked fire extinguishers rated 2A40B:C or greater shall be suitably placed as follows:

1. One for each 3,000 square feet of building area or major fraction thereof. Travel distance from any point of protected area to nearest extinguisher shall not exceed 100 feet.
2. One or more on each floor of buildings with at least one located adjacent to each stairway.
3. At least one located outside but not more than 10 feet from the door opening into any room used for storage of more than 60 gallons of flammable or combustible liquids.
3. At least one located not less than 25 feet, nor more than 75 feet from any outside flammable or combustible liquid storage area.
4. At least one within 50 feet of wherever more than 5 gallons of flammable or combustible liquids or 5 pounds of flammable gas is being used.

### **Noncompliance with Safety and Health Requirements:**

If during the course of the contract, our Safety and Health Manager notes any situations of non-compliance with the subcontractor's safety and health plan or with our Company's safety and health requirements, our Safety and Health Manager will bring them to the attention of our Project Compliance Officer and our Contracting Officer verbally (and will immediately follow-up in writing). Failure to correct the violation or continued violations shall be grounds for termination of the contract.

If after notifying the Project Compliance Officer and Contracting Officer in writing of deficiencies in any health, safety, or environmental requirements, and if our Safety and Health Manager finds continued violations of those requirements, or find actions that pose an imminent danger, an immediate order to stop work will be issued. Should this occur, our Safety and Health Manager will bring the matter to the immediate attention of the Project Compliance Officer and Contracting Officer. Such violations may result in the default of the contract.

Our Safety and Health Manager will document all violations brought to the attention of the subcontractor, Project Compliance Officer and Contracting Officer

### **Subcontractor Relations:**

Subcontractors' participation and inclusion in Pagoda Electrical, Inc. projects and safety initiatives are desired and are to be included in Pagoda Electrical, Inc. operations. Subcontractors assigned by Pagoda Electrical, Inc. to a project will attend and participate in:

- daily tailgate meetings and awareness activities;
- weekly safety meetings;
- jobsite safety inspections;
- ongoing safety and planning meetings;
- coordination meetings.
- incident, injury and illness response planning and
- project safety orientations;
- incident reporting and investigation procedures; and
- other such safety, health and incident prevention initiatives as may be established for all workers at a project location.

Subcontractor personnel, like regular Pagoda Electrical, Inc. personnel, are invited and expected to participate in these and other such activities as required in preparation for working safely at Pagoda Electrical, Inc. project location(s).

### **Job Safety Analysis and Task-specific Orientation:**

Subcontractor personnel will also participate in and cooperate with Pagoda Electrical, Inc. Safety and Health Manager in developing a daily task-specific Job Safety Analysis (JSA). This JSA will be used by Pagoda Electrical, Inc. Safety and Health Manager and the Subcontractor's job foremen to brief their respective employees on:

- the work to be performed,
- the hazards specific to the task they are being assigned to perform, and
- the specific work assignments.

The JSA must be reviewed and signed daily by each member of the work crew and each visitor to the job site, indicating his/her understanding of the work and the hazards and controls. Signing the JSA will usually occur during the required daily tailgate meetings.

### **Safety Training:**

The subcontractor must ensure that their employees have completed appropriate health and safety training when required by statute/regulation and our Company's requirements and provide documentation of such training when required by the contract.

Information and training is to be made available to subcontractors in the form of copies of written safety programs. Written programs from the Required Training list, based on hazard exposure are to be presented to subcontractors.

#### **Required Training for subcontractor Employees**

- General Safety Rules, including reporting of Unsafe Conditions
- Hazard Communication, Chemical Safety , and MSDS Familiarity
- Lockout-Tagout
- Electrical Safety



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- Evacuation Routes, Alarms & Procedures
- Hot Work Program
- Confined Space Program
- Process Safety Management
- Personal Protective Equipment
- Fall Prevention

### **Medical Clearance:**

The subcontractor must ensure that their employees have appropriate medical clearance when required either by governmental regulations or by our Company's requirements. Copies of medical clearance for subcontractor personnel are required to be presented as specified by the contract.

The Project Compliance Officer and our Safety and Health Manager shall, in conjunction with our Company's requirements, determine if additional medical requirements (i.e., Blood serum samples, immunizations) are required for subcontractor personnel prior to the start of work.

### **Incident Reporting:**

Our Safety and Health Manager will participate with subcontractors in the investigations of incidents resulting in injury/illness and/or damage or loss of government property and also near misses.

### **Safety and Personal Protective Equipment:**

Unless otherwise specified, the subcontractor is responsible for providing all necessary safety and personal protective equipment needed by their employees. This equipment must meet appropriate OSHA and ANSI approval requirements and be in good working order.

The subcontractor shall ensure that their employees have received appropriate training on the use and maintenance of safety and personal protective equipment prior to its use. Failure to correctly use appropriate safety equipment is a violation of the contract and may result in default of the contract.

### **Post-Project Review:**

Pagoda Electrical, Inc. requires a post-job safety review at the completion of work. The purpose of this is to review the job and identify items that worked well and those that could be improved. As with the "Pre-Job" safety meetings, the extent and formality of the meeting will be based on the scope of the job. Pagoda Electrical, Inc. will make a review of each Subcontractor's safety performance, incident and injury experience, identify lessons learned and other factors that will be helpful in evaluating the subcontractor's suitability for future projects. This will also assure better planning and a safer work experience the next time the job has to be performed. In the event that a subcontractor exits or is terminated from a project that remains in progress, a similar timely review will be performed.

Post-project evaluations will be performed by Pagoda Electrical, Inc. Safety and Health Manager in coordination with Pagoda Electrical, Inc. managers and supervisors who worked with the Subcontractor during the specific project under review.

### **Documentation:**

The subcontractor must provide our Company with documentation of all required training, medical exams, permits, material safety data sheets (MSDS), etc., for his or her employees or operations at the pre-construction meeting.