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CORPORATE SAFETY PROGRAM

Company Policy

Primary Electrical Contractors, Inc recognizes it is their responsibility to provide all employees with the necessary information to safely work with on or around on the job site. It is the employee's responsibility to utilize the information in this safety program to avoid job site accidents to themselves and/or co-workers and prevent property damage.

OVERVIEW

Safety:

Primary Electrical Contractors is dedicated to providing employees and others a safe and healthy working environment on construction projects. The exercise of diligence, good judgment and common sense on the part of all involved can create an environment, which substantially reduces the incidence of accidents. Primary Electric's program has the total commitment of all management levels and receives top priority in its application.

Primary Electric Safety Program governs the activities of all personnel employed in any capacity on construction projects. Primary Electric is dedicated to the goal, as stated by the Occupational Safety and Health Act (OSHA), to provide work and a place of work that is free from recognized hazards.

Safety Program Procedures

- + A statement of the construction employer's commitment to providing a safe and healthful workplace for all employees.
- + A statement of the construction employer's ultimate responsibility for the implementation of the safety and health program.
- + Pre-construction "Kick-Off" meeting with the employees to discuss the requirements and expectations of the client and construction employer (Pre-job/pre-task planning for safety).
- + New hire safety and health orientation training at the time of the initial hire of each new employee (substance abuse testing program required).
- + Periodic safety and health orientation training at the time of the initial hire of each new employee (substance abuse testing program required).
- + Specific assignment of responsibilities for job site safety and health inspections. A minimal of daily inspections for the detection of hazardous conditions or hazardous work performance.
- + Procedures for recording and reporting of incidents in accordance with the Occupational Safety and Health Act (OSHA). Procedures for the investigation of job-related accidents and illnesses to determine possible cause.
- + Specific designation of a management for review of injury and illness reports.
- + A policy with procedures for disciplinary action for the enforcement of the construction employer's safety and health program.
- + A system for ensuring that the entire management team is responsible and held accountable for the site safety program.

Employer/Employee Responsibilities

In addition to the aforementioned procedures, Primary Electric also requires all subcontractors/vendors to conform to the following Employer/Employee responsibilities.

- + Assume direct responsibility of not less than the minimum level of performance set forth in the Project Safety Program, which means full compliance with Occupational Safety and Health Standards, and all applicable Federal, State and local regulations.
- + Consider all safety factors during the planning and scheduling of work operations to control potential injury and property damage hazards.
- + Consider all safety factors during the planning and scheduling of work operations to control potential injury and property damage hazards.
- + Make his/her position in the Project Safety Program clear to his/her supervisory personnel and employees by stressing the importance that top management attaches to safety and loss control.
- + Provide and enforce the use of all necessary personal protective equipment, which includes but not limited to: hard hats, safety glasses, earplugs, face shields, respirators, safety belts, etc.

HARD HATS WILL BE WORN AT ALL TIMES – This includes Management, Vendors, etc.

- + Provide properly guarded and maintained tools, machinery and equipment.
- + Ensure that ground fault interrupters protect electrical power.
- + Provide and maintain good housekeeping conditions and adequate fire protection equipment.
- + Provide proper and adequate training for employees regarding the hazards of their jobs and how to work safely.
- + Correct unsafe work habits of employees as soon as they are observed.
- + Eliminate unsafe conditions under your control and promptly report (in writing and verbally) those conditions you cannot eliminate to Primary Electric.
- + Attend all scheduled safety meetings
- + Immediately notify Primary Electric of any incident which causes damage to property, and conduct an immediate investigation with a written report to Primary Electric within a 24 hours.
- + Report all injuries or accidents to Primary Electric. (A full report and investigation of an injury is required and must be submitted to Primary Electric within a 24 hour period.
- + Ensure employees who receive medical attention, obtain a medical work release from the attending physician and present it to Primary Electric before they return to work.
- + Furnish all reasonable information concerning the safety of his operations as may be required by Primary Electric.

- + Provide and properly maintain warning signs and lights, barricades, railings and other safeguards for protection of workmen and others on, about, or adjacent to the work as required by the conditions and progress of the work and as directed by Primary Electric.
- + Ensure that gasoline equipment is not operated inside enclosed buildings. The contractor shall locate gasoline operated equipment outside enclosed buildings or provide propane or electric power equipment for operation inside enclosed buildings.
- + Appoint an employee as a Safety Representative who will be available to Primary Electric to coordinate and administer the Safety Program. An alternate representative will also be made available, and is to have the same authority. In addition to other responsibilities, the Safety Representative will:
 - + Promote total job safety among employees and visitors.
 - + Represent the Trade Contractor, when necessary, in matters concerning safety.
 - + Investigate all accidents involving his/her Trade Contractor or subcontractor(s) to determine causes and action necessary to prevent re-occurrence.
 - + Initiate, monitor, and or conduct weekly safety meetings with all employees and submit a copy of written minutes, with signatures of attending employees, to Primary Electric.
 - + Follow-up on all recommendations submitted by Primary Electric, State, OSHA, etc.
 - + Each employee is responsible for learning and abiding by those rules and regulations which are applicable to the assigned tasks and for reporting observed or anticipated hazards to his immediate supervisor.

+ NO EMPLOYEE SHALL BE REQUIRED OR KNOWINGLY PERMITTED TO WORK IN AN UNSAFE ENVIRONMENT EXCEPT FOR THE PURPOSE OF MAKING SAFETY CORRECTIONS AND THEN, ONLY AFTER PROPER PRECAUTIONS HAVE BEEN TAKEN FOR THEIR PROTECTION.

- + Report any job-related injury or illness to the employer, and seek treatment promptly.

After three (3) warnings employees failing to work in a safe manner will be removed from the site.

SAFETY OUTLINE

Training

- Orientation
- Tool Box Meetings
- Methods (Section 6 in Corporate Safety Program)
- Safety Visits

Proper Work Environment

- Protective Gear – P.P.E.
- Tools & Equipment
- Security
- Logistics & Signage

Retraining, Reinforcement & Discipline

DUTIES AND RESPONSIBILITIES OF PERSONNEL

PROJECT MANAGER

1. The Project Manager has the full responsibility to implement and direct the Safety Program on his/her project. The execution of such programs must be in keeping with the explicit and implied statements of the Corporate Safety Program.
2. Be aware of reasonably available regulations pertaining to safety and health of employees in the work place, and utilize such information in the directing of project activities.
3. Actively support the program as an example to subordinates, with the decisions and directives it may require.
4. Enforce the observance of safety rules and regulations in connection with this project.
5. Delegate authority to others under his/her supervision to expedite and facilitate the application of the Safety Program. However, he/she still retains the responsibility for the Safety Program's implementations. The Corporate Safety Director will be notified of any such delegations.
6. Be the company representative in safety discussions at customer meeting.
7. For projects that do not have weekly Safety meetings, it is each of your responsibility to insure that each of our employees are aware that they should notify you of unsafe job conditions. If, after written notice to the general contractor the unsafe condition is not corrected, you shall in writing notify the general contractor that we will stop work and leave the job site until unsafe conditions are corrected.
8. It is also your responsibility to insure that each of our employees are observing the general contractor's safety rules as well as PEC.

CORPORATE SAFETY DIRECTOR

General: By directives and approvals from Management, the Director shall:

1. Establish procedures and guidelines for the Safety Program(s) and keep them updated.
2. Develop Safety Recommendations for specific operations.
3. Provide current information in government regulations for Occupational Safety and Health (OSHA), and keep Management and Supervisors advised of revisions or new regulations applicable to company activities.
4. Regularly visit projects and work sites for purpose of inspection and personal communication with personnel.
5. Attend meetings and conferences of Safety Councils, Contractor Associations and other organizations considered advantageous to the Company's interest. Attend training schools with courses for accident prevention and safety training.
6. Investigate accidents as considered necessary by Management. Work with Insurance Company representatives and Attorneys in the interest of company business with safety.

CORPORATE SAFETY DIRECTOR (cont.)

7. Collect reports required for records and for evaluations of performance of Safety and Accident prevention Programs.
8. Maintain liaison between field forces.
9. Maintain liaison between field forces and Owner's Safety Department.
10. Maintain OSHA logs, accident and injury reports.

CORPORATE SAFETY SUPERVISOR

1. Develop Safety Recommendations for specific operations.
2. Regularly visit projects and work sites for purpose of training, inspection, and personal communication with personnel.
3. Investigate accidents as considered necessary by Management.
4. Collect reports required for records and for evaluations of performance of Safety and Accident prevention Programs.

SUPERINTENDENT / FOREMAN

1. Design the work plan to create a safe work environment for Owner, Subcontractor's employees and employers. Recognize and mitigate hazards which arise out of the work place. Supervise the proper training for the recognition and avoidance of hazards. Support the Safety Program with a diligence equal to that applied to production
2. Superintendent will coordinate work activities so that the safety of any person or crew is not jeopardized by the activities of others. When these conditions are unavoidable, special instruction and safe guards are in order.
3. Superintendents are responsible for a program of both regular and as needed job safety inspections. Regular safety inspections will be made on a minimum of a weekly basis and will cover all work areas, including the work areas of subcontractors.
4. A supervisor's greatest contribution to the success of the Accident Prevention and Safety Program is the display of enthusiasm for the Program, and their earnest desire for accident-free production.
5. Superintendents will conduct periodic safety meetings and will require the attendance of Foreman and subcontractor representatives.
6. Superintendents shall see to it that new employees receive safety instructions and any particular hazards as the work place will be pointed out and the applicable precautions explained.
7. Superintendents shall investigate all accident or injury reports and sign designated report forms.

8. Superintendents are responsible for disciplinary action necessitated by a worker's unsafe acts.
9. Give consideration to all safety factors during the planning and scheduling of work operations to control potential injury and property damage hazards.
10. Provide and enforce the use of all necessary personal protective equipment, which includes proper foot wear and clothing.
11. Provide properly guarded and maintained tools, machinery and equipment and ensure employees personal tools are safety compliant.
12. Ensure that electrical power is protected by ground fault interrupters.
13. Immediately notify the Construction Manager of any incident which causes injury or damage to property, and secure the accident scene and preserve evidence until authorized personnel arrive to investigate the scene.
14. Plan and schedule work operations so as to control personal injury and property damage hazards.
15. Provide and maintain good housekeeping conditions and adequate fire protection equipment.
16. Provide proper and adequate training for employees regarding the hazards of their jobs and how to work safely.
17. Correct unsafe work habits of employees as soon as they are observed.
18. Eliminate unsafe conditions under your control and promptly report (in writing and verbally those conditions you cannot eliminate to the Project Manager.
19. Attend all scheduled safety meetings.
20. Promote total job safety among employees and visitors.
21. Represent Primary Electric, when necessary, in matters concerning safety.
22. Initiate, monitor, and/or conduct weekly safety meetings with all employees and submit a copy of written minutes with signatures of attending employees to the Construction Manager.
23. Maintain accident records and forward copies and/or reports to the Project Manager.
24. Initiate, monitor and/or conduct weekly safety meetings and maintain minutes of such meetings, with copy to Construction Manager.
25. Follow-up on all recommendations submitted by the Project Manager, State, MIOSHA, OSHA, etc.
26. Furnish all reasonable information as may be required by the Project Manager concerning the safety of his operations.

EMPLOYEES

1. Work according to good safety practices as posted, instructed and discussed. Obey Safety Rules and Regulations.
2. Keep the work area clean. Housekeeping is an individual responsibility.
3. Refrain from any unsafe act that may endanger yourself or fellow workers. Conduct yourself properly at all times and obey all fire control and no smoking signs.
4. If you see an unsafe condition, report it immediately to your supervisor. Any defective tools and equipment must be reported immediately to your supervisor.
5. Safety is a state of mind. The safety attitude is most important.
6. Know yourself – your abilities, your skills and your limitations.
7. Ask questions when you are not sure.

No employees shall be required or knowingly permitted to work in an unsafe environment except for the purpose of making safety corrections and then only after proper precautions have been taken for their protection.

These policies are procedures and all rules and regulations of the Occupational Safety and Health Act (OSHA) are mandatory and must be followed by all employees working on this site.

- 1. SAFETY ORIENTATION** – Upon entering the site to begin work, Superintendent/Foreman will conduct a safety orientation with all subcontractors and employees.
- 2. HARD HATS** – Hard hats must be worn at all times while on the job site.
- 3. PERSONAL PROTECTIVE EQUIPMENT** – Safety glasses/goggles and face shield must be worn while performing any operation which presents a risk of eye damage e.g. cutting, chipping, grinding, etc. Other personal protective equipment such as anchorage straps, body harnesses, life lines, lanyards, deceleration (shock absorbing) device, are to be used as the situation dictates.
- 4. EQUIPMENT** – All equipment shall be clearly and indelibly marked prior to entering the site. Mobile equipment must have back-up alarms.
- 5. CRANES** – Employees shall not work around cranes that do not have a current annual inspection checklist in the cab.
- 6. RIGGING** – Employees shall not use unsafe jacks, wire rope, slings & rigging hardware.
- 7. FLAMMABLES** – All solvents, gasoline, and other flammable liquids must be kept in safety cans and labeled. Fire extinguishers must be located near all flammable storage areas.
- 8. GAS AND AIR CYLINDERS** – All compressed gas and air cylinders must be kept standing in an upright position, securely fastened and away from any heat source. The storage of cylinders must be according to OSHA rules.
- 9. HOUSEKEEPING** – Employees must keep their work areas clean and orderly at all times.
- 10. BARRICADING AND SAFETY GUARDS** – Barricades must be erected and maintained where required! All overhead work must be guarded by proper barricades. All wall, floor or roof openings must be barricaded or covered.
- 11. WEARING APPAREL** – Shirts with sleeves must be worn at all times. Proper footwear must be worn. Tennis shoes are not appropriate for construction work.
- 12. VEHICLE SAFETY** – Motor vehicles are not to exceed posted speed limits while on the job site. Employees shall not ride in the back of pick up trucks unless the beds are enclosed or are equipped with safe and secure seating and guardrails.
- 13. FIRE LANES** – All fire lanes and aisles must be kept open and free of material and equipment.

14. JOB INJURIES – All accidents and injuries must be reported to the Field office immediately! A written report must be submitted within 24 hours of the accident or injury. When an employee receives medical attention, medical release forms from the doctor must be obtained by the employee and presented to the Project Foreman before the employee returns to work.

15. ALCOHOL AND CONTROLLED SUBSTANCES – Under no circumstance will alcoholic beverages or controlled substances be permitted on the job site. Any employee found in the possession of the above will be immediately sent home and will not be allowed back to work on the project.

16. LOCK-OUT/TAG-OUT PROCEDURE – Before working on energized equipment, employees shall get with their foreman and ensure that the lock-out/tag-out procedure has been complied with.

17. CONFINED SPACE PROCEDURE – Employees shall never enter a confined space before the air quality has been checked. Employees shall follow confined space entry guidelines.

18. DAMAGED CORDS, TOOLS, AND EQUIPMENT – Damaged cords, tools, and equipment must be discarded or repaired before re-use. DO NOT USE DAMAGED extension cords, unguarded hand tools, or unsafe equipment!

19. GFCI – Employees shall use ground fault circuit interrupters with extension cords and all power hand tools.

20. SCAFFOLDING – Must be erected and maintained in accordance with OSHA regulations. Proper guardrails, toeboards and a completely planked and secured work surface are required.

21. LADDERS – Must be kept in good working condition and secured from displacement before use. Employees must keep both hand free of tools, equipment, materials, etc., when ascending or descending a ladder. If necessary, use a load line for raising or lowering tools/equipment etc.

22. MANLIFTS – Employees shall always stand firmly on the floor (platform) of a manlift and shall not sit or climb on the railings or use planks, ladders, or other devices for a work position. A body harness shall be worn and lanyard attached to the boom or basket when working from an extensible and articulating boom platforms type manlift. Only trained persons shall operate manlifts.

23. HORSEPLAY – All forms of horseplay are strictly prohibited.

24. OPEN FIRES – There will be no open fires on the site.

25. FIREARMS AND/OR WEAPONS – Any employee found with weapons and/or firearms in their possession while on site will be subject to discharge.

26. DISCIPLINARY ACTION - Violations of safety policies and procedures, OSHA standards or any other regulation will result in disciplinary action up to and including discharge.



EMPLOYEE SAFETY INDOCTRINATION

The supervisor must thoroughly instruct each new employee in the safety requirements of his/her job. Check each of the items on this form at the time instruction is given. When completed, sign and return it for placement in the employee's file.

Employee's Name _____

Occupation _____ Date Hired _____

Department _____ Orientation Date _____

DATE COMPLETED

- _____ 1. Company safety policy reviewed and signed
- _____ 2. General safety rules discussed
- _____ 3. Specific job safety rules explained
- _____ 4. Reporting of unsafe conditions explained
- _____ 5. Proper lifting techniques reviewed
- _____ 6. Required personal protective equipment discussed
- _____ 7. Fire protection equipment & responsibilities explained
- _____ 8. Reporting of injuries reviewed
- _____ 9. All applicable Material Safety Data Sheets reviewed
- _____ 10. First aid treatment procedures explained

I have instructed the above new employee in the Safety requirement checklist and feel he/she can be reasonably expected to perform his/her duties safely.

Supervisor

Date



TRAILER COMPOUND WEEKLY INSPECTION

Project Name: _____ Project No.: _____

Inspected By: _____ Date: _____

Copies to: Safety File

Yes No

1. Are materials stacked properly?
2. Are all stored materials properly anchored?
3. Are high pressure gas containers properly secured?
4. Is dumpster area clean?
5. Are emergency numbers posted? (Police, Fire, Ambulance)
6. Is there someone responsible in coordinating the safety efforts of the subcontractors and suppliers on the job?

Name:

7. Are subcontractor employees on the job aware of who should be contacted in case of an accident?
8. Are weekly "tool box" safety meetings held with employees?
9. Are MSDS available for each project?
10. Is housekeeping satisfactory?
11. Is there regular disposal of waste and trash?
12. Waste containers provided on site, lunch areas, and at drinking water areas?
13. Are cables, hoses, and other lines clear of working spaces and walkways?
14. Are flammable liquids handled in approved safety cans?
15. Are containers properly identified?
16. Are there adequate fire extinguishers?
17. Are extinguishes identified by contents and purpose?
18. Are fire extinguishers fully charged and tagged?
19. Are extinguishers accessible within 100' (feet)?
20. Are "No Smoking" procedures followed where applicable?
21. Is fire lane clear and signs posted?

COMMENTS: _____

SAFETY DISCIPLINARY PROGRAM

The communication of the safety policies and procedures to employees is important, but of equal importance is the enforcement of these safety policies and procedures in a fair, consistent manner. To maintain fairness and consistency, the Superintendent must administer the proper discipline in accordance with the severity of the safety violation, proper discipline is determined as follows:

1. Has the safety violation been verified?
2. Is the violation deserving of a written reprimand?
3. Has a similar violation occurred before? If so, was it in the form of a written reprimand?

If the Superintendent can answer “yes” to (1) and (2) above, then it is fair to administer discipline. If the discipline administered is similar to that administered previously for similar offenses, then “consistency” is maintained.

The disciplinary action pattern is as follows:

1. **VERBAL WARNING** – A verbal warning will be issued by the Superintendent informing the employees of the safety violation.

2. **WRITTEN REPRIMAND** – A formal written notice will be issued by the Superintendent informing the employee of the safety violation and notifying the employee that a future violation will result in discharge from the project.

3. **WRITTEN DISCHARGE** - A formal written notice will be issued by the Superintendent informing the employee of the safety violation and notifying the employee that he/she will no longer be permitted to work as a result of the second written notice.

Upon Written Reprimand or Written Discharge, the following parties shall be notified in writing of the incident:

- o Project Manager
- o Corporate Safety Direct

The documentation should state what safety rule was violated, the level of disciplinary action administered (i.e. verbal/written reprimand or discharge) and any other comments the Superintendent wishes to note relative to the incident.



SAFETY HAZARD NOTIFICATION

EMPLOYEE _____

JOB NAME _____

YOU ARE IN VIOLATION OF THE FOLLOWING REGULATION(S)

HARD HAT _____

HOUSEKEEPING _____

PERSONAL PROTECTIVE EQUIPMENT _____

SCAFFOLDING _____

LADDERS _____

RAILINGS, BARRICADES _____

FIRE, EXPLOSION _____

HAND TOOLS _____

POWER HAND TOOLS _____

WELDING & CUTTING _____

HANDLING OF MATERIALS _____

POWERED EQUIPMENT _____

ELECTRICAL – EXTENSION CORDS _____

ELECTRICAL – LIGHTING OR POWER _____

SAFETY GOGGLES _____

WORK BOOTS _____

CLOTHING _____

OTHER _____

CORRECTION REQUIRED IMMEDIATELY
SUPERVISOR OR JOB SAFETY OFFICE:

DATE: