

OPS-SC-0007

Subcontractor Safety Management Policy

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1 Purpose

The enclosed information addresses expectations of Subcontractors, Tier Subcontractors and their invitees (herein-called subcontractors) visiting or performing work on Ampirical Solutions, LLC (hereafter referred to as The Company) projects. Each subcontractor working on a project of The Company is obligated to comply with all Federal, State, and Local safety requirements, The Company's requirements, and any Owner Safety requirements (herein after called safety requirements). These safety requirements constitute the minimum level of performance expected from each employer and its employees or their subcontractors, or agents. In addition, subcontractors are responsible for adherence to site-specific safety requirements defined by the project safety requirements. All subcontractors shall adhere to these requirements for the performance of their work on projects designed to promote the project's safe completion.

In accordance with the OSHA requirements, each subcontractor shall protect the employment and places of employment of each of its employees engaged in construction work by complying with the appropriate standards prescribed in the applicable standards. Subcontractors shall hold each of their agents, vendors, tier subcontractors, and suppliers responsible for compliance with these safety requirements. Subcontractors shall include these safety requirements in contracts with all tier subcontractors, vendors, and suppliers. Entry onto project, property, or the job site constitutes acknowledgement by the subcontractor, subcontractor employees, or invitee of their obligation to adhere to these safety requirements. Each subcontractor shall establish and maintain an effective Health and Safety Policy that addresses the requirements herein. The subcontractor shall be solely responsible for implementing the safety policy and shall have sole responsibility for monitoring the work of its employees, subcontractors, agents, vendors, and suppliers to ensure compliance. The subcontractor is responsible for obtaining the current version of The Company's site-specific safety requirements and The Owner safety requirements which may go above and beyond the requirements in this plan.

If prior to, or during the performance of, work on a project of The Company, any subcontractor experiences a fatality, OSHA Willful Citation, or OSHA Serious Citation on or off a project of The Company, then the subcontractor must notify The Company of the fatality or citation as soon as possible.

Anyone associated with the project has the right to Stop Work for any safety concern or potential safety concern at any time until the hazardous or unsafe condition no longer exists.

2 Scope

This policy applies to all subcontractors, tier subcontractors, vendors, suppliers, and their employees or representatives engaged in work on The Company's projects or accessing project sites. It covers phases of subcontractor activities, including pre-qualification, planning, mobilization, execution, and closeout, and encompasses required safety programs, training, reporting, and compliance obligations necessary to support safe project execution.

3 Responsibilities

3.1 Subcontractors

- Shall comply with all applicable federal, state, local, Company, and Owner safety requirements at all times.
- Are responsible for developing, implementing, and maintaining an effective Health and Safety Program and Site-Specific Safety Plan for their scope of work.
- Shall ensure all employees, tier subcontractors, vendors, and suppliers adhere to safety requirements and are properly trained and qualified.
- Shall conduct hazard assessments, pre-job briefings, and Job Safety Analyses (JSAs) to identify and control risks before and during work activities.
- Are responsible for reporting incidents, near misses, and unsafe conditions in accordance with Company requirements and within established timeframes.
- Shall correct unsafe conditions promptly and are accountable for any costs, impacts, or corrective actions resulting from non-compliance.
- Shall ensure employees report to work fit for duty and comply with substance abuse and safety policies.

3.2 Subcontractor Supervisors, and Safety Representatives

- Shall provide on-site leadership to enforce safety requirements and ensure safe execution of work.
- Are responsible for conducting safety meetings, inspections, observations, and audits as required.
- Shall ensure proper documentation is maintained, including training records, daily reports, JSAs, and incident reports.
- Are responsible for incident investigation, root cause analysis, and implementation of corrective and preventive actions.

3.3 Ampirical Project Leadership

- Shall establish and communicate safety expectations, requirements, and site-specific safety procedures.
- Will monitor subcontractor safety performance through audits, observations, meetings, and review of submitted documentation.
- May stop work for any unsafe condition or behavior and require corrective actions prior to resuming work.
- Will review subcontractor safety submittals (e.g., Site-Specific Safety Plans, Task-Specific Work Plans) for compliance with requirements.
- May enforce disciplinary actions, including removal from site or contract termination, for failure to meet safety expectations.

3.4 All Personnel (Including Visitors and Invitees)

- Are responsible for complying with all safety requirements and participating in safety programs while on-site.
- Have the authority and obligation to stop work for any unsafe condition until it is corrected.
- Shall immediately report hazards, unsafe acts, and incidents to supervision.

4 Violation of Safety Requirements

If a subcontractor or invitee is found non-compliant to any of the safety requirements, the subcontractor and employee(s) may be subject to one or more of the following.

4.1 The Company's request

- A written or verbal warning.
- A meeting conducted with the subcontractor's supervisor and management, and The Company Project Team with the subcontractor's documented corrective actions and timeframe for implementation.
- An investigation conducted by the subcontractor with a documented investigation report.
- Individual(s) removed from the project for a specified duration.
- Individual(s) removed from project and/or future Company projects.
- Training or re-training for individual(s), crew and /or foreman at the subcontractor's expense.
- Additional full-time supervision and/or safety representatives added to the project at the subcontractor's expense.
- Removal of unsafe conditions by using other workforces, the cost of which will be reimbursed through back charges or provisions of the contract.
- The Company may exercise its option to terminate all or part of the contract with the subcontractor for inadequate safety performance, or failure to fulfill any of the safety requirements of the contract.
- Any resulting damages (including damage for delay) will be paid for in accordance with the subcontract. All costs and expenses paid or incurred by a subcontractor in the implementation and administration of the safety requirements shall be paid by said subcontractor. When violations of the safety requirements are observed, the subcontractor responsible shall be informed orally for immediate correction. It is the sole responsibility of the subcontractor to devise and implement the correction. If The Company deems it is necessary to stop work being performed due to the nature of a violation, work will be halted until the subcontractor corrects the violations. Any costs incurred by the stoppage of work due to the violation will be the sole responsibility of the violating subcontractor.

5 Training Requirements

- All craft personnel, at a minimum, shall have completed OSHA 10-hour training as applicable for General Industry (29 CFR 1910) or Construction (29 CFR 1926) or Electrical Transmission and Distribution (ET&D 10) partnership recognition. Basic Orientation Plus (BOP) or other equivalent safety training may be utilized as a substitute for OSHA 10 if approved by The Owner and The Company. All Foremen or Supervisors, at a minimum, shall have completed OSHA 30-hour training as applicable for General Industry (29 CFR 1910) or Construction (29 CFR 1926) or the Supervisory Leadership Skills Outreach training course (ET&D 20) partnership recognition.
- Prior to performing any work on a project, all employees will be required to attend the site-specific environmental and safety orientation(s) and training(s) required by the Owner as well as The Company.

- Subcontractor Safety Representatives are required to meet the following:
 - Relevant experience in industrial and/or construction safety, hazard recognition, accident investigation, and root cause analysis; and
 - Safety credentials to ensure they have the necessary training and knowledge to ensure safe work. These credentials include: associate degree or higher in safety-related field, Certified Safety Professional (CSP), Associate Safety Professional (ASP), Certified Utility Safety Professional (CUSP), Certified Tree-care Safety Professional (CTSP), Construction Site Safety Technician (CSST), Occupational Health Safety Technologist (OHST), Certified Occupational Safety Manager (COSM), Certified Occupational Safety Specialist (COSS), OSHA 510 for Construction Industry, or OSHA 511 for General Industry. Other credentials may be approved at the discretion of The Company.
 - Resume must be submitted prior to mobilization for review by The Company and The Owner.
- The subcontractor shall maintain a training matrix defining all training requirements, qualifications, and certifications for all crew members. The matrix shall include names of all employees verifying complete training as required per employee working on the project. The matrix shall also include expiration dates of each training, qualification, or certification for each employee, along with job title.

6 Subcontractor Safety Representation

- The subcontractor's designated Corporate Safety Representative is expected to make, at a minimum, monthly jobsite visits to audit implementation of the subcontractor's Health and Safety Plan and the safety requirements. This representative will also be required to attend regular on-site safety meetings, as determined by The Company. Additionally, on-site Safety Representative(s) will be defined in the individual scopes of each project.

7 Qualification & Compliance Management

- All subcontractors shall be validated through The Owner's (if applicable) and The Company's third-party qualification and compliance management services. Qualification of subcontractors take into account incident/injury statistics, OSHA citations, post-job performance reviews, and other factors. Post-job performance reviews are conducted on each subcontractor after a project is completed. Any changes to the validation status of the subcontractor post-contract execution shall be communicated to The Company. Exceptions to validation status must be approved by The Owner (if applicable) and The Company.

8 Meeting and Report Requirements

8.1 Pre-Construction Meetings

- Subcontractors shall ensure that their project management and other key personnel, including their Site Supervisor and Safety Representative, at a minimum, attend a pre-construction meeting with The Company project management staff where planning for safe execution of the project will be addressed.

8.2 Weekly Subcontractor Meetings

- Subcontractor management and onsite supervision will take part in a weekly subcontractor meeting to discuss project progress and performance. The date and time of these meetings will be determined by the project team.

8.3 Safety Review Meetings

- Following an incident or safety issue, The Company may request a meeting be held with the parties involved to discuss the incident or issue in greater detail. Subcontractors shall attend and participate in the investigation, discussion, and develop an action plan.

8.4 Pre-job Briefing

- Each subcontractor will be responsible for conducting a daily huddle with each crew to identify the work activities for the day, the associated hazards of the work, and the control measures to be implemented. This process will be documented utilizing a Job Safety Analysis (JSA) and submitted to The Company as part of the Daily Report.
- The pre-job briefing and JSA will cover, at a minimum:
 - Emergency Action Plan
 - Scope of Work
 - Human Performance Tools and Traps
 - Task steps associated with the work
 - Hazards associated with the task
 - Elimination or mitigation of the hazards
 - Review of the Energy Wheel
 - Energy source controls
 - Personal Protective Equipment (PPE)
 - Heat Mitigation Plan when applicable.
 - Relevant regulations, Company requirements, and Owner requirements associated with the scope of work.
 - Review of risks including potential customer impacts
 - An additional, documented review after midday/lunch break
 - Additional reviews based on job scope changes

8.5 Daily Report

- Each subcontractor, including tier subcontractors, must submit to The Company, on a daily basis, a Daily Report. The subcontractor must complete all the information required on the Daily Report Form as required by The Company.

8.6 Monthly Hours Worked Report

- Each subcontractor must submit to The Company a Monthly Hours Worked Report in the company's Safety Data Management System. The subcontractor must also report any hours worked for any tier subcontractor working for them within this report. Information for the previous month is required by the 4th business day of each month.

9 Incident, Observation, and Audit Reporting

- Subcontractors are required to submit their incident investigation and reporting process. All incidents, events, accidents, close calls (near misses), unsafe acts, or conditions, first aid, and property damage experienced shall be reported, investigated, and analyzed by qualified personnel. The subcontractor is responsible for all costs associated with medical treatment and substance abuse testing for any subcontractor employees.
- If an injury or property damage occurs while working for The Company, as soon as any injured individuals are out of harm's way and receiving medical care (if needed), the subcontractor shall notify The Company as soon as possible, but no longer than one (1) hour with preliminary accident information. The Company's oversight personnel (including the Site Safety Manager) assigned to the project must be the initial notification. The notification needs to be a verbal conversation. A voice mail, text message or email is not acceptable as an initial means of communication. The Company must be the one notified and not The Owner while working as a subcontractor to The Company.
- An initial report (including possible photographs) of any injuries or significant events is required within twelve (12) hours of the incident identifying causes and immediate corrective actions. A final report of the injury or significant event is required within twenty-four (24) hours of the incident except for those classified as Serious Injuries and Fatalities (SIFs) or Potential Serious Injuries and Fatalities (PSIFs) as defined by the Edison Electric Institute (EEI). All SIF or PSIF events will receive a root cause analysis/causal determination report. Corrective actions will be developed, implemented, and monitored to determine the effectiveness in preventing re-occurrence. The Company may request a root cause/causal determination for any event it deems requires further analysis to prevent reoccurrence. When a root cause analysis/causal determination of the incident is required, it shall be provided to The Company within four (4) business days from the event.
- The Company may conduct an independent investigation at their own discretion, or when they deem it necessary as a supplement to that required of the subcontractor.
- The subcontractor will provide a copy of all documented inspections, audits, and/or observations to The Company on at least a weekly basis. A minimum of one safety observation per week is required to be conducted and documented on each work crew. Offsite management is required to conduct and document at least one monthly audit, observation, or engagement on onsite leadership.

10 Emergency Action Plan (EAP)

- The subcontractor shall have in place for each work location an Emergency Action Plan (EAP), which aligns with The Company EAP. This plan shall be communicated at each specific location and to those associated with the work. The subcontractor shall provide this plan to The Company for review prior to the start of any construction activities. All employees must understand the plan and have access to the plan in case of an emergency.
- The EAP must include at a minimum:
 - Project or location name, 911 address, and GPS coordinates.

- Process for reporting medical emergencies, fire emergencies, inclement weather, rescue plans, terroristic threats, and other emergent situations.
- Muster points, evacuation routes, rescue from heights, bomb threats, active shooter plan, reporting medical and fire emergencies and other emergent situations.
- Address and/or phone number to an occupational medical provider for use by employees who sustain a work-related injury when the injury necessitates this level of care; a phone number alone is sufficient for subcontractors utilizing a telemedicine system for their occupational medical provider.
- Address and phone number to the nearest medical facility (hospital) for use by employees who sustain a work-related injury when the injury necessitates this level of care.
- Contact information for all key personnel on location as well as appropriate management; phone numbers and locations for fire, police, emergency medical services.
- In case of an emergency, the person in charge of a crew, project, or scope of work shall be responsible for making the determination of the severity of the incident and making the appropriate call to 911, or determination of transportation to the closest facility to provide care.
- An inclement weather plan that includes heat, lightning, and extreme weather conditions. Weather conditions must be monitored continuously, and the affected employees must be notified of the weather conditions and the measures put in place to protect employees from inclement weather.
- Each subcontractor is to provide an appropriately sized First Aid Kit that is maintained and adequately stocked. The subcontractor must also ensure that certified CPR/First Aid/AED personnel are available at all times while working on a Company project.

Note: The occupational medical provider utilized as part of the EAP must specialize in occupational medicine and have extensive knowledge of OSHA guidelines.

11 Site-Specific Safety Plan

Each subcontractor shall establish and submit for review a written Site-Specific Safety Plan that includes details commensurate with the work to be performed. As a condition of their contract, all Subcontractors shall submit to The Company or designee a Site-Specific Safety Plan within fifteen (15) days after receipt of notice to proceed and prior to start of construction activities. The subcontractor's Site-Specific Safety Plan shall clearly describe the subcontractor's methods for meeting its obligations to provide a safe and healthy work environment, as well as to protect other trades, vendors, visitors, and members of the general public from the exposures generated by the subcontractor's work. The subcontractor's Safety Manual will not be accepted as a substitution for a Site-Specific Safety Plan. The Site-Specific Safety Plan must, at a minimum, include:

- Project Overview and Scope of Work to be performed including:
 - Identification of roles and contact information for management, supervision, and safety representatives (site-based and management).
- Credentials of safety representatives.
- The Emergency Action Plan (EAP).

- List of chemicals to be brought onsite and an up-to-date Safety Data Sheet (SDS) for each chemical.
- Job Hazard Analysis (JHA) for each task to be performed on the project. This must include job steps, hazards associated with each job step, sources of the hazards, controls to mitigate the hazards, and a risk assessment ranking for each task (e.g., 5x5 Risk Matrix).
- Documents that will be used frequently while on site such as:
 - Job Safety Analysis (JSA)
 - Heat Mitigation Forms
 - Human Performance Tools/Traps
 - Energy Wheel review
 - Equipment inspections
 - Incident Report Form
- Any other information on how the subcontractor will accomplish their scope of work safely.
- Safety Manual.
- The Company may request additional documentation for review based on the specific project or Owner requirements.
- As a part of providing a safe workplace, a translator is required for each crew in which there is a non-English speaking worker(s).

12 Task-Specific Work Plan

Each subcontractor shall establish and submit for review a written Task-Specific Work Plan that includes details commensurate with the work to be performed. This submittal must be completed by date specified by The Company and prior to the start of construction activities. The subcontractor's Task-Specific Work Plan shall clearly describe the subcontractor's plan for conducting the work and must, at a minimum, include:

- A detailed description of the work to be performed outlining construction sequence, hazards, and controls to mitigate the hazards.
- An estimated timeframe of days onsite to complete tasks.
- A list of specific equipment and materials to be brought onsite.
- A list of personnel with job titles involved in completing the task.
- A list of all subcontractors or potential subcontractors to be utilized on the project.
- A Traffic Control Plan if required by scope of work.
- Relevant drawings
- Other items deemed necessary to communicate the full scope of the work to be performed.
- The Company may request additional documentation for review based on the specific project or Owner requirements.

13 Fitness for Duty

- All subcontract employees are expected to arrive at work fit for duty. Employees must be able to physically perform required work activities. If employees are not able to or do not appear to be able to complete their duties, the Company may request a fitness for duty physical. Post-workplace injury or reported personal medical issues will be required to submit a physician's release to return to work.
- The illegal use or abuse of drugs and or alcohol constitutes a threat to the Health and Safety of employees and the general public. The Substance Abuse Policy requires employees to report to work fit for duty, and to perform their work, free of detectable levels of drugs, alcohol, or other substances, which may affect their ability to work safely. Each subcontractor shall establish and maintain an effective substance abuse program that at minimum is equivalent to The Company's Substance Abuse Program (copy of this program is available upon request). This program will be administered at the cost of the subcontractor. Drug and alcohol testing is required of subcontractor employees in the following situations:
 - There is reasonable suspicion that the individual is under the influence of drugs or alcohol (immediate testing required).
 - The individual was involved in a workplace incident that harmed or could have harmed employees; this testing will include all employees whose conduct could have contributed to the incident, not just the employee(s) who reported injuries (immediate testing required).