

Cromwell Construction, Inc.

SITE SAFETY PROGRAM

The safety rules and requirements contained in this Manual are not intended to take the place of any federal OSHA or state statutory safety requirements. It is the Subcontractor's responsibility to be familiar with, and to work in accordance with, this Safety Manual and with any and all state and federal safety rules in effect on the date the work is performed.

The requirements in this Manual may in certain instances be construed as more stringent than those set forth in federal or state law. In such instances, Subcontractor is required to comply with this Safety Manual.

Absence in this Manual of reference to any state or federal safety rule or requirement does not relieve Subcontractor of responsibility for familiarity and compliance with any and all such rules and requirements, or for familiarity, use and observance of, or for training its workers and supervisors in, safe working practices, whether part of state or federal law or neither.

Revised – April 2008



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1.0 INTRODUCTION

The construction industry is a hazardous occupation. The work requires alert minds, good health and the ability to carry on operations under difficult circumstances. Each operation presents its own particular problems, and no two jobs are alike; hence, it is not possible to formulate a set of rules, which will cover all the hazards that may be encountered in construction work. Because conditions change constantly on construction sites, these conditions must be monitored constantly.

Good health is a primary necessity to a construction worker and he/she should carefully regulate his/her manner of living. The construction worker is exposed to all sorts of weather conditions. Therefore, the matter of proper clothing to afford sufficient protection without greatly hampering the worker's movements must be given serious consideration.

Safety to the worker, as well as to others engaged in the same operation, is not only dependent upon total commitment from management and the judgment of the worker's superintendent or foreman in charge, but also on the individual workers themselves.

As a guide to Subcontractor's supervisors, superintendents, foremen and workers in the safe conduct of their work, this program has been prepared from the experience gained over many years of construction. These instructions and rules must be obeyed for the good of all workers. Proper safety devices and precautions must be used. Setting the tone for safety at the beginning of the project will pay off greatly throughout the job in terms of safety, quality and schedule.

Safe work practices and working conditions are values just like other beliefs, habits, and conduct people pursue and adhere to. A good definition of safety is: **DOING THE RIGHT THING FOR THE RIGHT REASON THE FIRST TIME.**

The Subcontractor is responsible to find the safe way to do a job before beginning a work process. In the event no rule is found to cover the situation in question, the worker should contact its organization's safety manager for specific instructions. Always think through the potential safety issues before undertaking any work process. If Cromwell Construction, Inc. finds the Subcontractor has not evidenced a plan for a safe work process, Cromwell Construction, Inc. may require the Subcontractor to suspend such process until it finds a safe method for performing the task or process.

1.1 SAFETY POLICIES AND PHILOSOPHY

Emphasis on safety has been a tradition and an integral part of Cromwell Construction, Inc.'s philosophy. The safety and environmental aspects of our projects are a very important measure of success in our industry. To this end, Cromwell Construction, Inc. is very concerned that our Subcontractors be committed to the safety and welfare of the people involved in our projects, including the customer, all contractors and their employees, our employees, and contract workers working on our projects. The Subcontractor is obligated to abide by all federal, state, local and end-customer safety regulations, as they pertain to our industry, and good practice as dictated by locations and circumstances, even in the absence of a regulation pertaining to the particular circumstance of a task or condition.

Cromwell Construction, Inc. considers OSHA Standards, Guidelines, and Regulations as the **minimum standards** for the construction industry. While complying with the requirements in this manual may involve some investment in the short run for those involved in a project, we are confident that through the lives, injuries, and money saved in the long run for all involved in the project, the investment will prove to be an excellent one, so we ask everyone to **“WORK SAFELY WITH US”**.

2.0 SUBCONTRACTOR'S RESPONSIBILITIES

1. Be accountable and responsible for Safety Program on assigned project job site in compliance with Cromwell Construction Safety Program Guidelines.
2. Maintain close contact with supervisors to advise them about safety problems and to give input regarding needed change to the safety policy.
3. Post on a regular basis information on relevant safety topics.
4. Take prompt action up to and including termination of any personnel from the jobsite to correct unsatisfactory conditions and work practices personally observed or brought to your attention. Whenever a violation of safety policy occurs and requires correction, document the demand for correction in your daily report. Unsafe situations, which involve subcontractors not under your control should still be brought to their attention and documented. Immediately discontinue work around the unsafe area.
5. Report and investigate all accidents as outlined in Sections 5.0 and 5.1 of this manual.
6. Maintain OSHA record keeping requirements.
7. Require all subcontractors to adhere to this Safety Program.
8. Be familiar with the requirements set forth in this manual as well as applicable federal, state, local laws pertaining to safety.

9. The various safety activities may be delegated to others, but the ultimate implementation and monitoring of Safety Control Techniques are the responsibility of the Subcontractor.
10. Have in possession at job site necessary protective safety equipment such as safety harnesses, shock absorbing lanyards, and appropriate shoes and use as needed for the work.
11. Plan ahead for good safety so appropriate equipment and safety systems are on hand when needed.

2.1 SUBCONTRACTORS TRADE FOREMAN/SUPERINTENDENT RESPONSIBILITIES

The worker's attitude toward safety is dependent on the attitude of their management, including the foreman/superintendent. As the person in direct charge, the foreman/superintendent must be responsible for avoiding accidents involving workers just as he or she is held responsible for the quality and schedule of the daily work. It is up to him or her to be certain that each worker works safely at all times. To meet this goal, he or she must:

1. Determine what each worker needs to know to perform his or her job safely and instruct the worker accordingly. Monitor the worker's activities as frequently as possible to make sure all activities are carried out in a safe manner. Use disciplinary action including termination, if necessary. **Give special attention and instructions to new or inexperienced workers.** Also, conduct safety training on new work processes before they begin.
2. Submit a written plan to the Cromwell Construction, Inc. Project Manager on how work processes (including temporary bracing) will be accomplished.
3. Identify potential accident causes prior to starting individual work activities and determine how to avoid these accidents prior to commencing work.
4. Check the job as frequently as necessary to determine if there are new hazards to be aware of--or if corrections or improvements can be made.
5. Verify that all equipment is maintained in safe condition and that personal protective equipment is used whenever necessary.
6. Ensure that all injuries are treated and reported promptly to Cromwell Construction, Inc..
7. Perform or assist in the investigation of all accidents or fires, regardless of whether or not an injury is involved. The foreman should be the person who knows the particular job or operation involved and is best suited to determine conditions responsible for the occurrence as well as corrective measures needed.
8. Report on the progress of the Safety Program in accordance with the procedures established.

9. Make workers realize the benefits of following safe practices and the costly alternatives--loss of life or painful injury, loss of wages or job, possible permanent loss of earning power, and possible permanent shutdown of an entire company.
10. Practice what you preach--especially regarding safety. Set a good example and follow through to correct workers when learning of unsafe conditions and acts.
11. Continuously monitor the weather. Keep workers informed about dangerous weather conditions. Discontinue work processes that could lead to injury/damage in hazardous weather. Anticipate hazardous weather conditions and secure job site accordingly before doing so becomes hazardous.
12. Stop or correct unsafe acts or conditions under your control immediately.
13. Allow enough time for adequate clean up and housekeeping every day.
14. Evaluate near injury situations and learn/educate from them.

2.2 WORKER RESPONSIBILITIES

1. Become familiar with the safety rules and abide by them.
2. Report to work ready to perform your job safely.
3. Use all personal protective equipment needed to safely perform your work.
4. Report all unsafe actions, conditions or equipment.
5. Report all incidents or injuries to the supervisor no matter how minor, including "near misses."
6. Be watchful of fellow workers as well as yourself.
7. Maintain good housekeeping habits and procedures on job site.
8. Continuously monitor the weather. Discontinue work processes, which could lead to injury/damage in hazardous weather. Anticipate hazardous weather conditions and secure job site accordingly.
9. Request and receive safety training on new work processes before they start. Take it seriously!
10. Perform all work according to Safe Operating Procedures. Safety is a skill--as much a part of your work as your trade!
11. Ask your fellow worker, "Is that safety first?" Let safety become a habit.
12. Horseplay, fighting and practical jokes are strictly prohibited. Such actions may subject the worker to removal from the project.

2.3 CROMWELL CONSTRUCTION PROJECT MANAGER RESPONSIBILITIES

1. Determine customer safety, health, and loss control requirements.
2. Evaluate project for safety, health, and loss control requirements that may require additional or unusual control methods such as unusual or difficult site, structure, or construction techniques, or unique state or city safety regulations.

3. Incorporate into proposal findings on the above and then communicate them to the project team. Plan safety and associated cost into the job, including requirements for independent anchor bolt survey check.
4. Ensure potential erection subcontractors are provided with copies of the general erection requirements prior to bidding work.
5. Provide all subcontractors a copy of the Safety Program manual prior to bidding work and ensure their understanding and requirement to abide by this program.
6. Assist in selling the long-term cost benefits of our Safety Program requirements to the customer, general contractor, and subcontractors. Communicate customer safety, health and loss control requirements to project team.
7. Obtain signed agreement (Exhibit B) – (Cromwell Construction Safety Program Acknowledgement and Agreement Form for Subcontractors) from contractor/subcontractor at the same time that the contract/subcontract is signed regarding understanding and compliance with Cromwell Construction's Safety Program requirements. Plan safety and associated costs into the job.
8. Support by good example and assist in monitoring compliance with Safety Program.
9. Provide leadership, authority, and decisiveness in dealing with noncompliance with the program up to and including terminating the subcontractor from the project.
10. Evaluate and use withholding of payment to subcontractor or other breach of contract remedies, including termination of contract and removal of the subcontractor from the site as appropriate when this safety policy is being violated.
11. Give ongoing input into necessary changes to this safety policy.
12. Bring to the attention of the safety manager any safety policy violations.

2.4 SUBCONTRACTOR'S SUPERINTENDENT RESPONSIBILITIES

1. Be accountable and responsible for Safety Program on assigned project job site in compliance with the Cromwell Construction Safety Program Guidelines.
2. Attend and provide input into the pre-construction safety planning meeting.
3. Schedule and lead pre-job general safety overview presentation at job site as the project begins. Participate in safety evaluation during post job audits.
4. Maintain close contact with supervisors to advise them about safety problems and to give input regarding needed change to safety policy.
5. Post on a regular basis information on relevant safety topics. Copy subcontractors with this information.
6. Take prompt action up to and including termination of any personnel from the jobsite to correct unsatisfactory conditions and work practices

- personally observed or brought to your attention. Unsafe situations, which involve subcontractors not under your control should still be brought to their attention and documented. Immediately discontinue work around the unsafe area.
7. Secure a copy of an independent survey which checks anchor bolt line and grade, and certifies them for proper placement before steel erection begins.
 8. Report and investigate all accidents as outlined in Sections 5.0 and 5.1 of this manual.
 9. 9. Maintain OSHA record keeping requirements.
 10. Require all subcontractors to adhere to this Safety Program.
 11. Be familiar with the requirements set forth in this manual and applicable federal, state, and local laws pertaining to safety.
 12. The various safety activities may be delegated to others, but the ultimate implementation and monitoring of Safety Control Techniques are the responsibility of the Superintendent.
 13. Have in possession at job site necessary protective safety equipment such as safety harnesses, shock absorbing lanyards, and appropriate shoes and use as needed for the work.
 14. Plan ahead for good safety so appropriate equipment and safety systems are on hand when needed.

2.5 SUBCONTRACTOR'S TRADE FOREMAN/SUPERINTENDENT RESPONSIBILITIES

The worker's attitude toward safety is dependent on the attitude of their management, including the foreman/superintendent. As the person in direct charge, the foreman/superintendent must be responsible for avoiding accidents involving workers just as he or she is held responsible for the quality and schedule of the daily work. It is up to him or her to be certain that each worker works safely at all times. To meet this goal, he or she must:

1. Determine what each worker needs to know to perform his or her job safely and instruct the worker accordingly. Monitor the worker's activities as frequently as possible to make sure all activities are carried out in a safe manner. Use disciplinary action including termination, if necessary. **Give special attention and instructions to new or inexperienced workers.** Also, conduct safety training on new work processes before they begin.
2. Submit a written plan to the Cromwell Construction, Inc. Project Manager on how work processes (including temporary bracing) will be accomplished.
3. Identify potential accident causes prior to starting individual work activities and determine how to avoid these accidents prior to commencing work. .

4. Check the job as frequently as necessary to determine if there are new hazards to be aware of--or if corrections or improvements can be made.
5. Verify that all equipment is maintained in safe condition and that personal protective equipment is used whenever necessary.
6. Hold a weekly safety meeting for all foremen of active trades on the project.
7. Ensure that all injuries are treated and reported promptly to Cromwell Construction, Inc.
8. Perform or assist in the investigation of all accidents or fires, regardless of whether or not an injury is involved. The foreman should be the person who knows the particular job or operation involved and is best suited to determine conditions responsible for the occurrence as well as corrective measures needed.
9. Report on the progress of the Safety Program in accordance with the procedures established.
10. Keep reports defining daily construction activities.
11. Make workers realize the benefits of following safe practices and the costly alternatives--loss of life or painful injury, loss of wages or job, possible permanent loss of earning power, and possible permanent shutdown of an entire company.
12. Practice what you preach--especially regarding safety. Set a good example and follow through to correct workers when learning of unsafe conditions and acts.
13. Continuously monitor the weather. Keep workers informed about dangerous weather conditions. Discontinue work processes that could lead to injury/damage in hazardous weather. Anticipate hazardous weather conditions and secure job site accordingly before doing so becomes hazardous.
14. Stop or correct unsafe acts or conditions under your control immediately.
15. Require all direct employees and second tier subcontracted workers to review and sign the site "General Safety Rules" **prior** to any work on the site (Exhibit A – Cromwell Construction’s General Safety Rules).
16. Allow enough time for adequate clean up and housekeeping every day.
17. Evaluate near injury situations and learn/educate from them.

3.0 PROJECT SAFETY PROGRAM ACKNOWLEDGEMENT

The project on-site Safety Program includes required activities, processes, and policies that are considered basic and essential. While local conditions may require certain variations, the principles outlined in this book provide a foundation for our Safety Program and will be of value to all involved in our safety efforts. (Exhibit B)

3.1 SUBCONTRACTOR PERSONNEL DRESS CODE AND PROTECTIVE EQUIPMENT REQUIREMENTS

All workers or other persons admitted to the job site shall wear short- or long-sleeved shirts, class 1 or higher ANSI 107-2004 high visibility upper body apparel, long pants, appropriate shoes for the work, and ANSI approved hard hats. When appropriate for the work process, shock-absorbing safety lanyard and approved safety harness, safety glasses, hearing protection, gloves, respirators, masks, and breathing apparatus shall be used, as well as other personal protective equipment for use under unusual circumstances. Personal protective equipment, which has been worn or used previously, shall not be re-issued to another worker until the article has been inspected, repaired as required and determined safe for use.

3.2 SPECIFIC JOB PROTECTION REQUIREMENTS

LADDERS/EXTENSION LADDERS/STAIRWAY SCAFFOLDS

Always be careful to avoid loading a ladder beyond its capacity to avoid excessive deflection in the middle. If this is the case, the ladders should be braced to prevent deflection. The ladder shall extend at least three (3) feet above the upper landing and secured top and bottom on both sides. NOTE: WE REQUIRE USE OF A STAIRWAY SCAFFOLD FOR WORKERS TO GET UP AND DOWN THE ROOF WORK AREAS ON ALL OF OUR PROJECTS. Stairway scaffold must be set up in such a manner that no unauthorized person may use it day or night and shall be posted with roof warning signs. They shall have a locking door and fence around the bottom of the tower. Portable ladders shall be used at such a pitch that the horizontal distance from the top support to the foot of the ladder is about one quarter of the working length of the ladder. THE USE OF ALUMINUM LADDERS IS **PROHIBITED**.

3.3 SIDING SAFETY REQUIREMENTS

OSHA regulations shall be followed regarding proper, safe use of equipment and work processes, scaffolding and staging.

SCAFFOLD AND SCAFFOLD ACCESS (MASONRY)

Scaffolding is a valuable tool in the building process, but improper use can cause serious injury or potential hazards. Inspection of scaffold components must be accomplished prior to first use and routinely while in place. Personal fall arrest equipment must be worn if work is performed at 6' or above and under these conditions:

Partial List

Scaffolding where there is no guardrail system-1926.451

(g)(1)(vii)

Work performed on boatswains', chair, catenary's, float, needle beam, ladder and pump J scaffold

1926.451(g)(1)

Working from aerial lift or boom/basket- 1926.453(b)(2)(v)

Access to scaffolding must be provided by the employer if the platforms are more than two feet above or below a point of access. Portable ladders, hook-on and attachable type ladders are permitted for access to scaffolding. Aluminum ladders are not permitted in Cromwell Construction, Inc. general safety rules, under any condition.

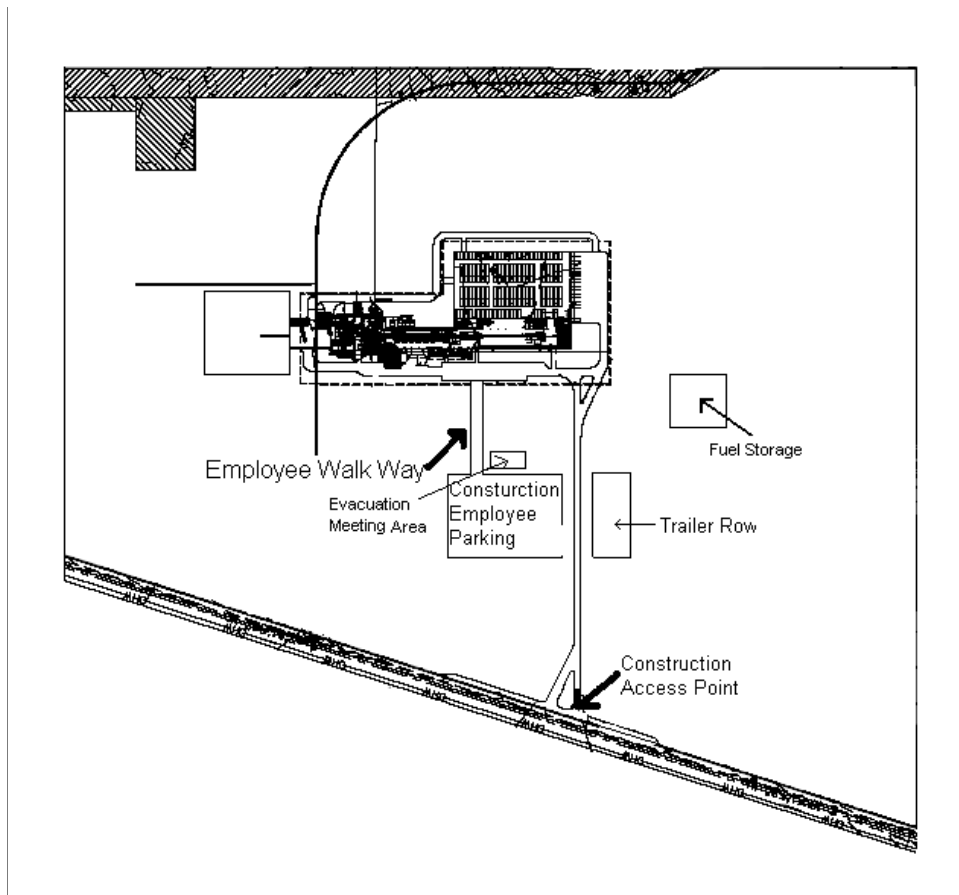
NOTE: Preventing hazards on construction sites is everyone's responsibility, but Cromwell Construction, Inc. philosophy is that managers, superintendents, and supervisors take lead in managing risk through planning and educating subcontractors working under our direction.

3.4 JOBSITE SAFETY PLAN

Preplanning before you reach the jobsite could make the difference between a safe organized job and chaos. The following are some simple steps that need to be taken before you reach the jobsite:

- Take a site plan and layout all of the critical areas.
- Establish where the vehicle access points and walkways will be. Try to separate the two as much as possible.
- Designate trailer and parking locations. Place your trailer in an area where you can easily see the construction activities and the vehicle access points.
- You will also need to develop an emergency evacuation point. You should also designate lay down areas.

Once this information is included on a site plan have the project manager distribute it to all of the subcontractors. An example is included below.



Research what is typical for weather in the project area. Make sure all of the jobsite roads, lay down areas, trailer row, and parking are in a condition to deal with the appropriate type of weather. Add rock wherever necessary in order to maintain stability of the site and a safe work environment.

Determine what kinds of severe weather are possible in your area and develop the appropriate emergency plans. An emergency team consisting of Cromwell Construction, Inc. and subcontractor personnel should be developed at the beginning of a project. This team will be responsible for informing all the people on site of the appropriate actions to be taken in the event of an emergency. This team will also inspect the site on a continuous basis to ensure that the precautions are being followed. In the event of impending severe weather secure all loose materials that could become airborne or water debris. Contain all flammable or hazardous materials in secure area or remove from site. If you use a conex, make sure that it is located in a remote site away from anything flammable or at risk of being contaminated. Have the site evacuated at least twelve hours before the expected arrival of severe weather. Take pictures that show the condition of the site before evacuation. On-site personnel should determine a safe place where they can meet and take shelter in the event of severe weather.

The next step would be to find out where the nearest hospital is located. Develop maps of the quickest routes to the hospital and have copies in an easily accessible area in case there is an accident. You should also contact the local fire, police, and ambulance to be sure that they are aware of your project and know where it is located. Sometimes new and unfamiliar addresses can delay response times.

You should also take a moment to research the local requirements as they pertain to safety regulations. Some states have more stringent requirements than federal OSHA and if you don't know about them it could result in citations.

3.5 MOBILE EQUIPMENT REQUIREMENTS

Per Federal OSHA standards, forklift training is required to include state driver requirements.

People and equipment must be separated so as to avoid people being struck by or run over by equipment. All subcontractors of Cromwell Construction, Inc. shall have their forklift equipped with a rotating beacon light, which is visible 360 degrees. If this is not possible with one light, more beacons will be required. Also, reflective red/white tape shall be placed on the sides and rear of the lift (minimum 72 square inches on rear and 72 square inches on each side.) In addition, OSHA requirements for illumination/lighting on equipment used in the dark must be followed.

3.6 OTHER SAFETY REQUIREMENTS

1. All mechanized personnel lift equipment shall be equipped in accordance to OSHA regulations. Personnel shall be tied off to all high lift equipment (including boom and scissor lifts), toe boards in place, and an operator shall always be at the controls when workers are off the ground in high-lift equipment. No scaffolding shall be permitted off any man lift. All types of lifts shall be boomed down before moving them. If man baskets are being used in conjunction with forklifts, this must be in accordance with the forklift manufacturers policy and agreement. Man baskets must be secured to forklifts with positive connections. Protect workers' hands from mast lift chains or devices. Man lifts shall have capacity posted (and tested per OSHA requirements) as well as inside handrails.
2. Personnel in a lift basket shall be tied off above headache ball. Riding the ball or other parts of the lift mechanisms shall be prohibited.
3. Flag persons shall be used for rigs during operation and when relocating machine.
4. No one under the age of eighteen (18) shall be permitted on a job site unless accompanied by a supervisor 100% of the time. UNDER NO

CIRCUMSTANCES SHALL A PERSON UNDER AGE 18 BE EMPLOYED ON A JOB SITE.

5. No one will be allowed on the site while under the influence of intoxicants or drugs that impair your ability to work safely. ANYONE VIOLATING THIS REQUIREMENT IS TO BE IMMEDIATELY REMOVED FROM THE SITE AND DISCHARGED. Do not allow the person under the influence to leave the site unassisted. Call a taxi or use other means. Intoxicating beverages or illegal drugs are not allowed on site at any time.
6. 6. Floor openings will be covered securely or protected with guardrails.
7. Guardrails and barricades will be erected and maintained. If removed for access, the removing party will replace them immediately. All excavations over four feet deep must be guarded by a shoring system, sloping of the ground or other equivalent means per OSHA requirements.
8. All subcontractor employees will be given a safety orientation by their supervisors before they start to work and before new work processes start. This orientation will apply to general instructions regarding safety rules of the project. It is recommended that other subcontractors on the job site also give safety orientations to their new employees as well before they start to work.
9. Safety meetings will be held each week. Attendees and minutes of the meeting are to be recorded, including sign-off on understanding and adherence to topics covered. If a worker does not participate, he or she will not be allowed to continue working on the project.
10. The contractor and the owner shall use signs and posters bearing pertinent regulations to convey warnings, directions, and instructions to personnel and the public as required. The observance of warning signs shall be required of company personnel and visitors while on the job.
11. Hard Hats. All project construction areas will be considered "Hard Hat Areas." The wearing of hard hats by ALL employees, subcontractors, and visitors in the construction area will be strictly enforced.
12. All accidents, no matter how slight, must be reported to the superintendent and foreman immediately. IN ADDITION, "NEAR ACCIDENTS" AS DEFINED ABOVE MUST ALSO BE REPORTED.
13. Guard or barricade skylights from roof traffic per OSHA requirements.
14. No horseplay or scuffling is permitted. Offenders are subject to disciplinary action up to and including removal from the site and termination.
15. Report all unsafe practices and conditions to your foreman at once. If not corrected with reasonable promptness, report to job superintendent. Do not continue to expose yourself to hazardous conditions.

16. Housekeeping, safety, and efficiency go hand in hand. Always keep your job clean.
17. All protruding re-bar and conduit shall be guarded or capped immediately.
18. 18. Familiarize yourself with the fire extinguisher and first aid locations.
19. Do not use defective or broken tools and equipment. Use the proper tool or equipment for any job you do.
20. Goggles, protective clothing and footwear must be worn when chipping, grinding, welding, cutting and working with compressed air or when necessary to be close to such an operation being performed by another. Always use gloves when exposed to cutting hazards. Some projects may require 100% use of safety glasses. Check the "Job Specific Rules" for clarification.
21. Riding on equipment or trucks in an area not designed for riding is forbidden.
22. Do not attempt to lift or move heavy loads without adequate assistance. Learn to lift properly. Lift with your leg muscles, not your back.
23. Do not try to place speed and the schedule above SAFETY! If all workers will be watchful of everyone else, as well as themselves, accidents can be prevented.
24. Always face ladders when ascending or descending. Tie off all ladders and report broken or unsafe ladders immediately.
25. Keep clear of swinging buckets, loads and counterweights. Never walk on blind side of equipment.
26. Only authorized, qualified, trained personnel are permitted to operate specific equipment. Follow these regulations: No one but qualified personnel is to make repairs and service electrical equipment.
27. Be sure power tools are being maintained and properly used, including electrical cords and guards. All tools must be grounded and double insulated. GFCI electrical systems and generators are required on our projects.
28. Make sure compressed gas containers are anchored securely.
29. Use a safety tie for air hose and coupling.
30. Always have operating back-up signals on equipment.
31. Adequate lighting shall be required for the work being accomplished.

4.0 SUBCONTRACTOR SAFETY PROGRAM

Each subcontractor will establish a project Safety Program in detail to address the particular characteristics and requirements of each project.

4.1 SUBCONTRACTOR SAFETY PROCEDURE

Each subcontractor at any working tier on our projects is contractually obligated to comply with Federal OSHA safety standards, all statutory safety requirements, our Safety Program and, if any, the owner's Safety Program. These safety requirements constitute the minimum safety performance expected of each subcontractor.

Cromwell Construction, Inc. reserves the right to require its subcontractors to submit in writing to the Cromwell Construction, Inc. Project Manager, their written plan on how work processes under their scope of work will be accomplished. This submittal may be required before the work process begins.

4.2 DESIGNATION OF SAFETY REPRESENTATIVE

Each subcontractor shall designate to the Cromwell Construction, Inc. Project Manager a competent supervisor to carry out its Safety Program. Where the nature or size of the contract warrants, a full-time, qualified safety representative may be required.

4.3 RECORD KEEPING AND REPORTING

All fatal or serious injuries shall be reported immediately to the Construction, Inc. Project Manager. The subcontractor's project superintendent shall notify the appropriate state and/or federal authorities when required. The subcontractor shall cooperate in conducting incident investigations, including submission of a comprehensive report of the incident, and provide access to workers for purposes of interviewing and providing written and oral statements.

Each contractor/subcontractor shall maintain accurate incident and injury reports. Distribution of reports should be as follows:

- Original to Cromwell Construction's Safety Manager

5.0 ACCIDENT REPORTING REQUIREMENTS

The following procedure will be followed after getting proper medical care for the injured:

1. The appropriate subcontractor's supervisor, along with the worker's foreman will ascertain the apparent severity of the accident.
2. If the accident is such that the worker has to go to the hospital, the subcontractor will call the Construction Project Manager immediately. If the Project Manager cannot be reached, contact a member of Cromwell Construction response team immediately.

3. The following are Response Team members and their phone numbers:
4. If the accident requires the worker to go to the doctor's office only, but there is a question in the subcontractor's mind, "Should I call the Construction Project Manager anyway?," please call the Construction Project Manager immediately to clear up the question. No matter how minor the accident is, the subcontractor shall always notify the Construction Project Manager of the accident.

5.1 ACCIDENT INVESTIGATION PROCEDURES

After contacting the Construction Project Manager or a member of the Response Team, begin the process of making an Accident Investigation Report (Exhibit C) taking the following steps:

1. View the scene of every accident. The area can change completely within hours. Take Photos, where possible.
2. If a piece of equipment is involved, hold it secure, if possible.
3. Property damaged should be held for inspection.
4. Secure the names of all parties involved, i.e., property owner, injured party and witnesses.
5. Do not speculate or discuss the accident with people outside the Construction Organization.
6. Delay can be very costly—start the investigation immediately.
7. Send the original copy of the Accident Investigation Report form, overnight mail, to the Construction Project Manager and keep a copy for your file. Complete this form as fully as possible immediately after the accident. Send additional information which may surface (including doctor's report, developed photos, etc.) separately as soon as available.
8. Fill out required OSHA accident forms on a timely basis.