

Subcontractor Safety Program

American Wolf Construction — Arizona's Most Referred. For A Reason.

This program sets the safety expectations for every subcontractor performing work on an American Wolf Construction ("AWC") jobsite. It is not intended to be all-inclusive. Before starting work, the AWC safety representative and the subcontractor will meet to discuss safety concerns specific to the scope and develop an action plan.

1. Subcontractor Pre-Job Information

Company name: _____

Company safety supervisor: _____

Phone: _____

Email: _____

Contract / project number: _____

Project location: _____

Scope of work



Subcontractor representative

Title

AWC representative

Title

2. Subcontractor Documentation Checklist

Does your company have a written Safety & Health program? (If yes, provide a copy for AWC's files)

☐ Yes ☐ No

If no — name of company safety representative: _____

Do we have your signed subcontract on file?

☐ Yes ☐ No

Do we have your Insurance Certificate and Workers' Compensation Certificate?

☐ Yes ☐ No

Have you been cited by OSHA in the last five years?

☐ Yes ☐ No

Do we have your subcontractor Dust Registration Number? (if applicable)

☐ Yes ☐ No

Dust control permitting requirements vary by jurisdiction. Confirm the applicable Maricopa County or other county requirement for the project location.

Does your company have a written drug and alcohol policy?

☐ Yes ☐ No

3. AWC Safety Inspections & Audits

AWC believes inspections and continuous training are integral to an effective safety management program — they hold everyone accountable for safe work performance and support AWC's effort to eliminate unsafe conditions from the jobsite.

Corporate audit

AWC Corporate Safety will periodically review and evaluate the site safety management program for effectiveness. The Project Superintendent conducts a weekly jobsite safety inspection to identify and eliminate hazards.

Foreman

Each foreman inspects their work area prior to each shift, intermittently throughout the shift, and as necessary to ensure a safe and healthful working environment. As the key link between craft employees and management, the foreman carries major responsibility for their work area.

Project safety

Project safety personnel perform a daily jobsite walk to inspect for health and safety concerns and eliminate unsafe practices and conditions.

4. Subcontractor Inspections & Responsibilities

While AWC is responsible for ensuring safety rules and procedures are adequate and enforced, the program's success depends on full cooperation from everyone on site. Informal safety inspections are conducted daily; formal safety inspections are conducted weekly.

As a subcontractor, it is your responsibility to participate in the inspection process for your scope of work and help facilitate the health and safety program.

Responsibilities include:

- Immediately correct any imminent danger or hazard.
- Assist in identifying and correcting unsafe conditions, including work practices not compliant with city, county, state, federal, and OSHA regulations.
- Have a representative present for all jobsite safety and health meetings.
- Inform employees of all safety and health rules and procedures prior to any onsite work.

Jobsite safety meetings will be held:

☐ Daily ☐ Weekly ☐ Bi-weekly ☐ Monthly ☐ Other: _____

5. Subcontractor Safety Obligations

Subcontractors are responsible for the health and safety of their workers as regulated by all applicable acts and regulations. You are obligated to comply with all regulations and codes concerning safety standards established during the progress of work, and to conduct all operations within the law and site-specific standards.

Under OSHA's multi-employer workplace doctrine, owners and general contractors may be held responsible not only for their own violations but also for violations committed by subcontractors over whom they have control. This is why AWC enforces these requirements consistently.

- The subcontractor shall actively promote safe working performance among its employees.
- Site supervisors shall participate in safety meetings and safety inspections.
- Each subcontractor is expected to conduct its own safety program suited to its scope of work.
- All subcontractors shall hold "tailgate" safety meetings with their workers at least weekly. Minutes shall be forwarded to the site safety representative.
- Subcontractors shall inform employees of the location and proper use of emergency equipment.
- Subcontractors shall use their own customary inspection system to identify and correct hazardous conditions, safety rule violations, and unsafe practices within their scope.
- The subcontractor site supervisor shall provide current address and telephone number to the project superintendent for after-hours emergency contact.
- Subcontractors shall train their employees on the site-specific evacuation plan.

6. General Rules of Conduct

The following list is not all-inclusive and will be strictly enforced:

- No possession or consumption of non-prescription drugs or alcohol, or violation of the AWC substance abuse policy.
- No horseplay, practical jokes, pranks, or running.
- No theft of AWC property, personal property, or third-party property.
- Failure to work in a safe manner or other violation of safety rules is grounds for removal from the project.
- No threatening, intimidating, coercing, or abusive language, or interfering with job performance.
- No harassment of any kind, including sexual harassment, or indecent verbal or physical contact.

- No firearms or weapons on the jobsite or owner's property.
- No pets on the jobsite.
- No radios except for communication purposes.
- Cell phone use is restricted to work-related communication and must not create a distraction hazard.
- Notify the AWC safety representative of any injury immediately.
- All employee vehicles brought on site are subject to search.
- All pockets, purses, briefcases, toolboxes, and other containers on site are subject to search.

The original program prohibited all non-company-issued cell phones. That is difficult to enforce in practice and can impede emergency communication; the revised language targets distraction instead. Confirm the intended standard before release.

7. Drug & Alcohol Policy

To ensure a safe and productive work environment and to protect owner and company property, AWC maintains a drug and alcohol policy. No employee or subcontractor employee working on an AWC project may work under the influence of drugs or alcohol. Subcontractor employees found with reasonable cause to be under the influence will be reported to their supervisor and removed from the work.

8. Pre-Job Checklist

Check the boxes for the items your company will be involved in on this site. After checking the items below, review the corresponding section of this program and confirm you understand the standards set forth.

Topic	Applies	Topic	Applies
Hazard Communication (Right to Know)	☐	Ladder safety	☐
Personal Protective Equipment	☐	Scaffolding and work platforms	☐
Fire prevention and protection	☐	Excavations, trenching, shoring	☐
Housekeeping	☐	Confined space work	☐
Hand and power tools	☐	Lockout / tagout	☐
Fall protection	☐	Forklift / powered industrial truck	☐
Material handling, use, and storage	☐	Other:	☐

9. Hazard Communication — “Right to Know”

Subcontractors must comply with the Hazard Communication standard for the construction industry. Each chemical brought on site must be accompanied by a Safety Data Sheet (SDS), and a copy of that SDS must be made available to AWC. The standard requires all chemicals on the worksite to be evaluated for physical or health hazards and all hazard information to be available to employees.

The five parts of the program are: written program, safety data sheets, container labeling, information and training, and employee right to know.

Does your company have a written hazard communication program?

☐ Yes ☐ No

Have your employees been trained in Hazard Communication?

☐ Yes ☐ No

Are all chemical containers brought on site properly labeled?

☐ Yes ☐ No

Have all SDS sheets for chemicals on site been given to the onsite safety representative?

☐ Yes ☐ No

Are SDS sheets for all chemicals on site available to your company for review?

☐ Yes ☐ No

10. Personal Protective Equipment

All employees are required to wear personal protective equipment appropriate to recognized hazards. The following is required on all AWC jobsites:

- Hard hats are mandatory in the field. Bump caps and metal hard hats are prohibited. Head protection shall meet the current applicable ANSI/ISEA standard.
- Eye protection is mandatory in field settings and shall meet ANSI Z87.1. Additional eye and face protection — chemical splash goggles, face shields, welding shields — is required for welding, burning, grinding, chipping, and handling chemicals, corrosive liquids, or molten metal.
- Construction-type protective footwear meeting the current applicable ASTM standard.
- Cutting glasses, goggles, or face shields with proper shade protection for the type of cutting performed. Welding hoods are required when using arc welders.
- Shirts must have a minimum 4-inch sleeve. No tank tops or muscle shirts. Long pants required; no shorts.
- Fall protection is required when exposed to falls of 6 feet or more, in accordance with 29 CFR 1926 Subpart M.
- Hearing protection is required for any employee exposed to 90 dBA or above over an 8-hour period, and recommended in all high-noise areas.
- Appropriate respiratory protection shall be used when exposed to dusts, fumes, mists, vapors, or gases, in accordance with applicable OSHA requirements.
- High-visibility vests are required on this site.

11. Fire Prevention and Protection

The following is required on all AWC jobsites and is not all-inclusive:

- ☐ Telephone numbers for firefighting agencies and emergency medical services are posted in all jobsite trailers.
- ☐ Emergency number for this site: 911. Refer to the Site-Specific Safety Plan for additional emergency numbers.
- ☐ All employees should be trained in the application and use of fire extinguishers.
- ☐ All flammable and combustible materials are properly stored until consumed or removed.
- ☐ Gasoline and other flammable materials are stored and handled in approved portable tanks or safety cans. No plastic fuel containers or containers without safety latches are allowed.
- ☐ Smoking is prohibited within 50 feet of any fuel storage area.
- ☐ An adequate dry chemical fire extinguisher is within 25 feet of any welding, burning, cutting, or open flame operation. Metal grinding operations require an extinguisher present as well.

12. Housekeeping

Good housekeeping is a basic requirement on all jobsites and must be maintained at all times. Removing accumulated scrap lumber, banding, pallets, boxes, trash, and wire on a regular basis reduces sprains, puncture wounds, cuts, fires, and slip and trip hazards.

- Work and storage areas shall be kept clean and orderly.
- Materials stored in tiers shall be stacked, racked, blocked, interlocked, or otherwise secured against sliding, falling, or collapse.
- Clear walkways shall be maintained for free movement of employees.
- Rubbish, debris, and waste shall be collected and discarded daily.
- Protruding nails, spikes, wire, and banding shall be bent down or removed before cutting and burning operations proceed.
- Flammable and combustible liquid storage and dispensing areas shall be kept clear of other combustibles and separated from work areas.
- Housekeeping is everyone's responsibility and shall be performed as work progresses. Clean as you go.

13. Hand and Power Tools

- Tools shall be used only for their intended purpose and maintained in safe working condition.
- All guards and safety devices shall be in place and functioning.
- All electrically powered tools shall be used with GFCI protection.
- Pneumatic impact tools shall have safety clips or retainers to prevent tools being expelled from the barrel.

- Compressed air hose connections shall be chained or secured to prevent whipping. Cracked, split, or separated hose shall be replaced — duct tape repairs are prohibited.
- A face shield and fire extinguisher are required when using an abrasive cut-off saw.
- Chain-falls and come-alongs with defective throat latches shall be replaced; the latch must close completely against the hook tip.
- Powder-actuated tools shall be used only by manufacturer-trained and certified personnel.
- Tools shall not be altered with handle extensions or cheaters without written manufacturer approval.
- Taglines shall be used to control all overhead loads, long enough for employees to stand clear, and free of knots and tangles.

14. Fall Protection

AWC requires fall protection whenever an employee works at a height of six feet or greater above a lower level, and as otherwise required by local, state, and OSHA regulations. General fall protection requirements are found at 29 CFR 1926, Subpart M. AWC strongly enforces these requirements.

- An approved safety harness with two lanyards must be worn when working 6 feet or more above the ground or a lower floor elevation.
- Fall protection is required when climbing any structure other than a ladder.
- Rebar hooks and chains are not fall protection. Tie off with a shock-absorbing, double-locking lanyard.
- Anchorage points must be capable of supporting 5,000 lbs and should be at least waist high.
- Any employee working from scaffolding above 10 feet with incomplete handrail or decking must be tied off.
- On ladders exceeding 24 feet used for access only, workers must be tied off.
- Around roof or floor openings with a fall greater than 6 feet, workers must be tied off.
- When using a ladder over 6 feet as a work platform, workers must be tied off.
- On unprotected structures, work platforms, vessels, and incomplete scaffolds without standard railings on all open sides and ends, workers must be tied off.

15. Ladder Safety

Ladders are heavily used in construction and are a frequent source of injury. The following are strictly enforced:

- Ladders with loose or missing nails, bolts, screws, or bracing, or with cracked, broken, badly dented, or worn rungs, cleats, or side rails shall be removed from the jobsite.
- Ladders with corroded metal parts shall be removed from the jobsite.
- Metal ladders are strictly prohibited on or around electrical installations or exposed circuits.
- Never increase ladder height by placing it on boxes, crates, or tailgates.
- Never tie or fasten two ladders together to create longer sections.
- All manufactured ladders shall be equipped with approved safety feet.

- Never place ladders in doorways, walkways, or exits unless protected by barricades. Keep top and bottom access areas clear.
- Never use a ladder as a platform, runway, or scaffold.
- Always climb facing the ladder using both hands. Carry tools in a tool belt or use a hand line.
- Only one person on a ladder at a time. Never move or reposition an occupied ladder.
- Extension ladder bases shall be set at a 4:1 pitch and extend 3 feet above the landing point.
- Extension ladders must be secured by staking the bottom and tying the top, or held in place by a person.
- Fall protection is required when working from a ladder where a fall hazard exists. Never lean out; keep your body between the side rails.
- Never use a step or frame ladder as an extension ladder. Step ladders must be fully opened with spreaders locked and all four feet on solid level ground.
- Never work from the top step of a step ladder, or from the back side unless it is a double-sided ladder.

16. Scaffolding and Work Platforms

Scaffolds and work platforms shall be complete and constructed in accordance with federal, state, local, AWC, and client requirements, and erected in accordance with 29 CFR 1926.451.

- A designated competent person must be on site to oversee scaffolding operations.
- All scaffolding and work platforms shall be erected, moved, altered, or dismantled under the supervision of a competent person.
- Inspect all equipment prior to use. Bent, broken, incomplete, or damaged material shall be discarded immediately and documented.
- Never work below scaffolding or work platforms in use by others.
- Guardrails and toe boards shall be installed on all open sides and ends of platforms more than 10 feet above the ground or floor.
- Footings and anchorage shall be sound, rigid, and capable of carrying the maximum intended load without settling. Barrels, boxes, loose brick, and concrete blocks shall not be used as support.
- Load-carrying timber members shall be 1,500 lb fiber-stress-grade construction lumber.
- Planking shall be scaffold grade or equivalent; maximum permissible spans shall not be exceeded.
- Platform planking shall be overlapped a minimum of 12 inches or secured against movement, and shall extend over its ends no less than 6 inches and no more than 12 inches.
- An access ladder or equivalent safe access shall be provided.
- Overhead protection shall be provided when overhead hazards are present.
- Materials hoisted onto scaffold shall have a hand line.
- Tools, materials, and debris shall not accumulate in quantities that create a hazard.

17. Excavations, Trenching, and Shoring

All excavation, trenching, and shoring work must be performed under the direct supervision of a competent person. No work shall be performed without the permission of the designated competent person.

Name of excavation supervisor: _____

- A designated competent excavation supervisor must be on site at all times.
- All employees must be trained in safety precautions and associated hazards prior to entry.
- Adequate perimeter protection must be established before the excavation is opened and expanded as the excavation grows.
- Daily excavation reports must be completed.
- Excavated material shall be placed a minimum of 2 feet from the excavation edge.
- Access and egress must be established every 25 feet.
- Standard guardrails and handrails shall be provided where walkways cross excavations.
- Excavations greater than 5 feet deep shall be protected by shoring, sloping, benching, or other protective systems.
- Employees shall not work in excavations where water has accumulated.
- Excavations deeper than 20 feet must be designed by a Registered Professional Engineer licensed in the applicable state.

18. Lockout / Tagout

Any employee involved in a task requiring lockout/tagout shall be trained accordingly. Consult the on-site safety representative for additional information.

- ☐ Check if your company will be involved in any procedures requiring lockout/tagout, and inform the AWC safety representative.

Additional remarks: _____

19. Forklift / Powered Industrial Trucks

Operator training is required under the OSHA powered industrial truck standard. As a subcontractor, it is your responsibility to have individuals trained to the current standard. If your work requires forklift use on site, consult the AWC safety representative regarding training documentation.

Will your company be operating a forklift on site?

- ☐ Yes ☐ No

Are your operators trained per the current standard?

- ☐ Yes ☐ No

Additional remarks: _____

20. Material Handling, Use, and Storage

- Materials stored in tiers shall be stacked, racked, blocked, interlocked, or otherwise secured against sliding, falling, or collapse.
- Aisles and passageways shall be kept clear for safe movement of material handling equipment and employees, and kept in good repair.
- Material stored inside buildings under construction shall not be placed within 6 feet of any hoistway or inside floor opening, or within 10 feet of an exterior wall that does not extend above the top of the stored material.
- Bagged material shall be stacked by stepping back the layers and cross-keying the bags at least every 10 bags high.
- Brick shall not be stacked more than 7 feet high. A loose brick stack reaching 4 feet shall be tapered back 2 inches per foot above the 4-foot level.
- Masonry block stacked higher than 6 feet shall be tapered back one-half block per tier above the 6-foot level.
- Used lumber shall have all protruding nails withdrawn before stacking.
- Lumber piles shall not exceed 20 feet in height; lumber handled manually shall not be stacked more than 16 feet high.
- Inside storage rooms shall maintain at least one clear aisle 3 feet wide.
- Containers over 30 gallons capacity shall not be stacked one upon another.
- Flammable and combustible liquids in excess of 25 gallons shall be stored in a room and in an acceptable storage cabinet.
- At least one portable fire extinguisher rated not less than 20-B shall be located not less than 25 feet nor more than 75 feet from any outside flammable liquid storage area.

21. Notice of Safety Violation (Form)

Detach or reproduce this page as needed. Complete on site and provide a copy to the subcontractor's foreman.

Project name: _____

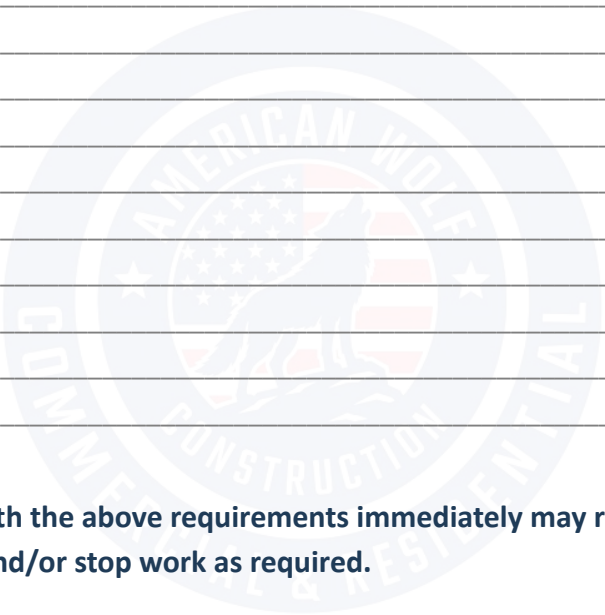
Project location: _____

Subcontractor: _____

Date: _____

Time: _____

You are hereby advised of the following violation(s) of the Department of Labor Construction Industry Standards, 29 CFR 1926:



Failure to comply with the above requirements immediately may require the Contractor to act on your behalf and/or stop work as required.

Subcontractor's foreman

Date

AWC supervisor

Date

22. Subcontractor Safety Agreement

I have read and understand the standards set forth for subcontractors working on American Wolf Construction jobsites. If I have any questions, I will review them with AWC's safety representative. I acknowledge that these standards apply to my employees and to any sub-tier subcontractors I engage.

Subcontractor company representative — printed name

Date

Signature

AWC representative — printed name

Date

Signature

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