



F. R I C H A R D
WILTON
C O N T R A C T O R

Safety Health & General Policies Manual

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TABLE OF CONTENTS

3.....	Office Directory
6.....	Statement of Safety and Health Policy
9.....	Company Safety Rules
13.....	Scaffold Safety Program
19.....	What is a Scaffold?
20.....	Scaffolding Frames and Braces
21.....	Footings and Foundations
22.....	Scaffolding Platforms
23.....	Proper Scaffold Access
24.....	Manually Propelled Mobile Scaffolds
25.....	Inspection of Scaffolding Equipment
26.....	Code of Safe Practices: Scaffolding Guidelines
30.....	Fall Protection
31.....	Fall Protection Policy
36.....	Ladder Safety – Safety Training Handout
37.....	Written Hazard Communications Program
39.....	Personal Protective Equipment (PPE) Program
41.....	Clothing Requirements
42.....	General Housekeeping Guidelines
43.....	Fire Protection Policy
45.....	Injury Notification Procedure
47.....	Accident Investigation Procedure
50.....	Electrical Safety Policy
51.....	Lockout-Tagout Procedure

54.....	Responsibilities
56.....	Formal Safety Audits
57.....	Training Requirements
59.....	Voluntary Respirator Use
60.....	Sanitation Policy
61.....	Policy for Mobile Devices on Jobsites
63.....	Disciplinary Action Policy
65.....	Company Vehicle/Driver Policy and Procedures
72.....	Drug Free Workplace Policy
74.....	Company Electronic Equipment Policy
77.....	Equal Employment Opportunity; Accommodations and Anti-Harassment Policy
81.....	Leave Policies

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STATEMENT OF SAFETY AND HEALTH POLICY

I. Company Commitment

Safety is paramount at F. Richard Wilton Jr. Inc. (the "Company") and we enforce the ultimate safety standards at all times. The management of F. Richard Wilton Jr., Inc. recognizes the importance of safety and health in making life more rewarding, and our commitment goes beyond the required OSHA safety practices. Our operations are guided by an established safety policy that is based on a sincere desire to eliminate personal injuries, occupational illnesses and damage to equipment and property.

Under no circumstances will the standards of safety be lowered or overlooked in the interests of time or profit. Safety rules and regulations are put into place for the protection of our employees, temp labor, subcontractors, clients and the general public.

F. Richard Wilton Jr., Inc is also committed to providing a Drug Free Workplace.

II. Statement of Safety

F. Richard Wilton Jr., Inc. intends to comply with all safety standards and regulations set forth by the Virginia Occupational Safety and Health (VOSH) and Occupational Safety and Health Act (OSHA).

The prevention of injuries and losses is a shared responsibility of management and each employee throughout the entire organization.

Safe work practices are included to assist the employee in working safely with pride, while performing his/her duties. Employee participation is the key to preventing losses. All employees are encouraged to make suggestions, which will assist in maintaining safe working conditions, and to bring to the attention of the Supervisor any unsafe working conditions. Through joint participation, accidents can be prevented, but only **You**, the individual, can make safe work practices a habit and part of your everyday life. All employees should maintain continuous safety awareness.

Certain safety standards have been established in this manual. These standards are to be considered the minimum. Supervisors are entrusted with the responsibility to use their judgment to ensure all operations are performed in the safest manner possible. The cooperation of all employees is needed and will be expected.

III. Explanation of Manual

F. Richard Wilton's Safety Manual is a result of the expertise and cooperative effort of many individuals within F. Richard Wilton Jr., Inc. This manual contains rules and policies regarding safety and health practices within the workplace and is intended to provide information to assist in maintaining an effective Safety and Health Program. Additionally, this manual is to serve as guidance to all temp labor providers and subcontractors on F. Richard Wilton's Safety Policies and Rules.

F. Richard Wilton's Safety Manual alone does not constitute a Safety and Health Program, however, by following the guidelines and recommendations set forth in this manual, an effective Safety and Health program can be maintained and implemented.

IV. Program Goal

Our goal is to control the risks associated with workplace hazards to prevent events that may cause injury or illness to our employees through:

- Effective involvement of each employee of the company
- Elimination of all known and recognized hazards that expose or create risks
- The application of basic safety techniques in all phases of work
- Practical follow-up on recommendations developed during audits and accident investigations
- Consistent application of policies and rules in all operations
- Ongoing reduction of losses
- An increase of employee awareness of the overall safe operation on a jobsite

V. Goal Attainment Essentials

- Management's support of all safety and health programs
- Employee commitment to a safe and healthy workplace
- Established line of communication involving all employees at each level for safety and health concerns
- Continuous employee training
- The enforcement of all rules and policies with fair and effective discipline
- Assigned responsibility and accountability for the Safety and Health Program
- All employees working cooperatively and adhering to the same general safety policies and procedures

VI. Enforcement of Policies

Each member of management, supervision, operations and any persons contracted to provide services will follow all policies set forth in this manual.

F. Richard Wilton Jr., Inc. expects strict compliance with its Safety Rules and Policies. Policy violations will be handled accordingly through the company's Disciplinary Action Program and may result in disciplinary action up through and including termination.

It is the responsibility of each member of management and supervision to ensure these policies are made available to their employees and their jobsites are in compliance with these policies.

VII. Review and Revision to Policies

F. Richard Wilton Jr., Inc.'s safety rules and regulations will be reviewed periodically for validity and compliance to regulatory agencies. If a policy is to be changed, copies of the update will be sent to appropriate personnel for additional input and suggestions.

VIII. No Contract of Employment

Nothing set forth in this Manual constitutes a binding contract with F. Richard Wilton Jr., Inc. or is intended to or does in any way alter the at-will employment relationship between F. Richard Wilton Jr., Inc. and its employees. F. Richard Wilton Jr., Inc. reserves the right to interpret the policies in this Manual in its discretion. **Additionally, while this Manual is provided to temp labor providers and subcontractors to provide guidance on F. Richard Wilton's Safety Policies and Rules, nothing in this Manual creates or is intended to create an employment relationship between F. Richard Wilton Jr., Inc. and any temp labor providers or subcontractors. The policies contained in this Manual that do not relate to Safety Policies and Rules (such as Equal Employment Opportunity and Leave Policies) are not applicable to non-employees such as temp labor providers and subcontractors, and nothing herein creates or is intended to create any entitlement to employee rights or benefits for individuals who are not employed by F. Richard Wilton Jr., Inc.**

IX. National Labor Relations Act

Nothing herein, shall prohibit or infringe on any employee's right to engage in: (i) organizing a union to negotiate with F. Richard Wilton Jr., Inc. concerning wages, hours, and other terms and conditions of employment; (ii) forming, joining, or assisting a union, such as by sharing employee contact information; (iii) talking about or soliciting for a union during non-work time, such as before or after work or during break times, or distributing union literature during non-work time, in non-work areas, such as parking lots or break rooms; (iv) discussing wages and other working conditions with co-workers or a union; (v) taking action with one or more co-workers to improve working conditions by, among other means, raising work-related complaints directly with the employer or with a government agency, or seeking help from a union; (vi) striking and picketing, depending on its purpose and means; (vii) taking photographs or other recordings in the workplace, together with co-workers, to document or improve working conditions, except where an overriding F. Richard Wilton Jr., Inc. interest is present; (viii) wearing union hats, buttons, t-shirts, and pins in the workplace, except under special circumstances; or (ix) choosing not to engage in any of these activities.

COMPANY SAFETY RULES

1. All unsafe acts and conditions are to be reported to your foreman **immediately**.
2. **All injuries, regardless of how minor they may be, must be reported to your foreman the day of the occurrence.**
3. All forms of horseplay are strictly prohibited. Employees engaged in physical confrontations, threats of violence or threats on property damage would be subject to disciplinary action up to and including be barred from jobsites.
4. Hard hats will be worn at all times while on the jobsite.
5. Eye protection will be worn at all times.
6. Respiratory equipment will be worn when working with dry mortar or cement, or when required by MSDS for chemical use. Consult Wilton respiratory protection plan.
7. Tampering with or unauthorized use of fire extinguishers is **strictly prohibited**.
8. Employees are **not** to ride as passengers on construction equipment.
9. Construction equipment must not be operated within 10 feet of overhead high voltage power lines.
10. Operators getting on or off equipment while equipment is in motion is prohibited.
11. Operators must be in driver's seat before starting equipment.
12. The operation of any equipment or power tool **without proper authorization is prohibited**.
13. Employees are not allowed to work under a suspended load.
Example: steel beam or column erection
14. The operation of machinery, power tools or construction equipment without proper training and instruction is prohibited.
15. Good housekeeping practices are required of all employees.
16. Cranes or boom lifts will not be operated unless properly barricaded.
17. Cranes or boom lifts will not be operated unless outriggers rest on adequate cribbing or other firm, secure footing.
18. Slings, chokers, etc. will be inspected before each lift. Those that are worn, frayed, kinked or otherwise damaged will be removed from service immediately.

19. The use or possession of intoxicants or illegal drugs on company property or jobsites is **forbidden**.
20. When it becomes necessary for any employee to use prescription medication during working hours, the employee must inform his/her supervisor.
21. Scaffolds will be erected on sound rigid footings. Unstable objects, such as barrels, boxes, loose bricks or concrete blocks, will not be used to support scaffolds or planks.
22. Employees shall not work on scaffolds over 10 feet in height that are not provided with standard guardrails or proper fall arrest systems (top rail, mid rail and toeboard) or are not built according to scaffold erection guidelines.
23. Employees shall not work on scaffolds 4'-10' in height, having a minimum horizontal dimension in either direction, of less than 45", that are not provided with standard guardrails.
24. Damaged, bent, or otherwise defective scaffold members shall not be used.
25. Employees **shall not** climb scaffold frames or braces.
26. All scaffolds shall be provided with properly secured access ladders or steps.
27. Regardless of footing, all tubular scaffold frames shall be set on screw jacks, base plates, or concrete slabs, when permitted.
28. Scaffold planks shall extend over their end supports by no less than 6", and no more than 12".
29. Employees shall not work on freestanding manually propelled mobile scaffolds that exceed two times the scaffold's minimum base dimension.
30. Employees shall ensure that the wheels on manually propelled mobile scaffolds are locked before climbing the access ladder.
31. Employees **shall not** work on manually propelled mobile scaffolds that are not completely decked full width of frame.
32. Employees **shall not** work on tubular or mobile scaffolds that are not completely braced, including diagonal braces.
33. Tubular welded frame scaffolds must be secured to the structure at each end and at intervals not to exceed 30 feet horizontally, regardless of height.
34. Prior to ascending or descending a ladder, the employee shall check the ladder for broken or split steps.

35. Prior to ascending or descending a ladder, the employee shall ensure that the ladder is secured against a displacement and extends at least 36" above the landing when using as an access ladder.
36. Ladders shall not be used in a horizontal position as platforms, runways, scaffolds, or for other than their intended purpose.
37. Ladders shall not be used to support scaffold boards.
38. Metal ladders shall not be used where they may contact energized electrical conductors.
39. Ladders shall not be placed in passageways, doorway, driveways, or any location where they may be displaced by other work, unless protected by barricades or guards.
40. 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.
41. The areas around the top and bottom of the ladder must be kept clear of debris, cords, welding leads, and other tripping hazards.
42. Portable ladder feet must be placed on a firm, substantial base.
43. Wooden ladders are prohibited.
44. Only employees who have been trained in the operation of the particular powder actuated tool in use will be allowed to operate such tools.
45. Employees **will not** remove guards from tools or equipment or make safety devices inoperative.
46. Employees **will not** operate equipment that has had guards removed or other safety devices made inoperative.
47. Electrical cords with broken insulation **will not be used**.
48. Employees will not use temporary or permanent power without GFCI protection.
49. Three-wire electrical cords without a ground pin **will not be used**.
50. Ungrounded electrical tools will not be used, including double-insulated tools.
51. Electric cords must not be run through doors, etc. without protection against damage to insulation.
52. Guards **will not be removed** from temporary lights. When it becomes necessary to remove a guard from a temporary light to replace a bulb, the guard **must be replaced**.

53. A full body harness with lanyards will be used on scaffolds when guardrails cannot be installed.
54. Fire extinguishers will be obtained prior to starting welding or open flame operations and will be kept in the area of such operations.
55. Signs prohibiting smoking or open flames will be posted on or near all fuel tanks, at refueling areas, and flammable liquid storage areas.
56. A 20-B.C. fire extinguisher will be located within 75' of each fuel tank or flammable liquid storage area.
57. **ALL EMPLOYEES** will make themselves aware of the location of the OSHA Safety and Health Poster, emergency telephone number, hazard communication program and the HAZCOM Program Poster, the MSDS Book and the location of the first aid supplies.
58. Employees will abide by all signs and posters and will not violate any barricade.
59. Fall protection begins at 6'.
60. Employees shall not work on roofs or any other similar structure without proper fall protection.
61. All forms of weapons and firearms are not allowed on ANY F. Richard Wilton Jr., Inc. jobsites. Strict adherence to this policy is required. The Police will be notified to remove any individual who is in violation of this policy or poses a threat to anyone's well-being. Any violation of this policy will result in disciplinary action up to and including being barred from jobsites.
62. All F. Richard Wilton Jr., Inc. employees, temp labor, and subcontractors are required to don PFAS before using ANY type of aerial lift. While aerial lift is in use, all workers shall maintain 100% fall protection while in the lift.

SCAFFOLD SAFETY PROGRAM

I. Purpose

The purpose of this safety policy and procedure is to establish guidelines for the protection of F. Richard Wilton Jr., Inc. employees who work on scaffold work surfaces.

II. Applicability

Scaffolding has a variety of applications. It is used in new construction, alteration, routine maintenance, renovation, painting, repairing, and removal activities. Scaffolding offers a safer and more comfortable work arrangement compared to leaning over edges, stretching overhead, and working from ladders. Scaffolding provides employees safe access to work locations, level and stable working platforms, and temporary storage for tools and materials for performing immediate tasks. Scaffolding accidents mainly involve personnel falls and falling materials caused by equipment failure, incorrect operating procedures, and environmental conditions. Additionally, scaffolding overloading is a frequent single cause of major scaffold failure. This safety policy and procedure provides guidelines for the safe use of scaffolds. It includes training provisions and guidelines for scaffold erection and use.

III. Reference

This safety policy and procedure is established in accordance with Occupational Safety and Health Standards for Health Standards for Construction Industry (29 CFR 1926.451).

IV. Policy

Scaffolds shall be erected, moved, dismantled, or altered only under the supervision of a competent person and will have guardrails and toeboards installed, when applicable. If scaffolding hazards exist that cannot be eliminated, then engineering practices, administrative practices, safe work practices, Personal Protective Equipment (PPE), and proper training regarding Scaffolds will be implemented. These measures will be implemented to minimize those hazards to ensure the safety of employees and the public.

V. Responsibilities

It is the responsibility of each superintendent, jobsite foreman, and employee to ensure implementation of F. Richard Wilton's safety policy and procedure on Scaffolds. It is also the responsibility of each F. Richard Wilton employee to report immediately any unsafe act or condition to his or her supervisor.

VI. Procedure

This section provides applicable definitions, establishes general provisions, and identifies specific responsibilities required by F. Richard Wilton's safety policy and procedure on Scaffolds.

VII. Definitions

- A. **Brace:** A tie that holds one scaffold member in a fixed position with respect to another member. Brace also means a rigid type of connection holding a scaffold to a building or structure.
- B. **Coupler:** A device for locking together the component tubes of a tube and coupler scaffold.
- C. **Harness:** A design of straps which is secured about the employee in a manner to distribute the arresting forces over at least the thighs, shoulders, and pelvis, with provisions for attaching a lanyard, lifeline, or deceleration device.
- D. **Hoist:** A mechanical device to raise or lower a suspended scaffold. It can be mechanically powered or manually operated.
- E. **Maximum Intended Load:** The total load of all employee, equipment, tool, materials, transmitted, wind, and other loads reasonably anticipated to be applied to a scaffold or scaffold component at any one time.
- F. **Mechanically Powered Hoist:** A hoist which is powered by other than human energy.
- G. **Outriggers:** The structural member of a supported scaffold used to increase the base width of a scaffold in order to provide greater stability for the scaffold.
- H. **Platform:** The horizontal working surface of a scaffold.
- I. **Safety Belt:** A strap with means for securing about the waist or body and for attaching to a lanyard, lifeline, or deceleration device.
- J. **Scaffold:** Any temporary elevated or suspended platform and its supporting structure used for supporting employees or materials or both, except this term does not include crane or derrick suspended personnel platforms.

VIII. Training

- A. Affected employees will receive instruction on the particular types of scaffolds which they are to use. Training should focus on proper erection, handling, use, inspection, and care of the scaffolds. Training must also include the installation of fall protection, guardrails, and the proper use and care of fall arrest equipment.
- B. This training should be done upon initial job assignment. Retraining shall be done when job conditions change. Periodic refresher training shall be done at the discretion of the supervisor.
- C. Company designated “competent person(s)” will receive additional training regarding the selection of scaffolds, recognition of site conditions, recognition of scaffold hazards,

protection of exposed personnel and public, repair and replacement options, and requirements of standards.

IX. Safe Scaffold Erection and Use

A. Safe scaffold erection and use is important in minimizing and controlling the hazards associated with their use. Scaffold work practices and rules should be based on:

1. Sound design
2. Selecting the right scaffold for the job
3. Assigning personnel
4. Fall protection
5. Guidelines for proper erection
6. Guidelines for use
7. Guidelines for alteration and dismantling
8. Inspections
9. Maintenance and storage

X. Types of Scaffolds

A. There are many different types of scaffolds used at F. Richard Wilton. Two major categories are:

1. **Self-supporting scaffolds** are one or more working platforms supported from below by outriggers, brackets, poles, legs, uprights, posts, frames, or similar supports. The types of self-supporting scaffolds include:
 - a. Fabricated Frame
 - b. Tube and Coupler
 - c. Mobile
 - d. Pole
2. **Special use scaffolds** and assemblies are capable of supporting their own weight and at least 4 times the maximum intended load. The types of special use scaffolds include:
 - a. Outrigger
 - b. Step, Platforms, and Trestle Ladder

XI. Responsibilities

A. Superintendent/Project Managers

Superintendents will ensure adequate funds are available and budgeted for the purchase of scaffolds in their areas. They will also identify the employees affected by this safety policy and procedure. Managers/Unit Heads will obtain and coordinate the required training for the affected employees. Managers/Unit Heads will also ensure compliance with this safety policy and procedure through their auditing process.

B. Supervisors/Jobsite Foreman

Supervisors will not allow any employee who has not received the required training to perform any of the tasks or activities related to scaffold erection and/or dismantling. Supervisors will communicate appropriate needs to managers/unit heads and/or supervisors. Supervisors will ensure that employees are provided with PPE as necessary for their job. Supervisors will ensure that a competent person is in charge of scaffold erection according to the manufacturer's specifications.

C. Competent Person

The competent person will oversee the scaffold selection, erection, use, movement, alteration, dismantling, maintenance, and inspection. The competent person will be knowledgeable about proper selection, care, and use of the fall protection equipment. Additionally, the competent person shall assess hazards.

D. Employees

Employees shall comply with all applicable guidelines contained in this safety policy and procedure. Employees will report damaged scaffolds, accessories, and missing or lost components. Employees will assist with inspections as requested.

E. Safety Department

Safety and Loss Control will provide prompt assistance to superintendent/project managers, supervisors/jobsite foreman, or others as necessary on any matter concerning this safety policy and procedure. Safety and Loss Control will assist in developing or securing required training. Safety and Loss Control will also work with Warehouse to ensure that all newly purchased scaffolds comply with current safety regulations and this safety policy and procedure. Safety Engineers will provide consultative and audit assistance to ensure effective implementation of this safety policy and procedure.

F. Warehouse Manager

The Warehouse Manager is responsible for ensuring that purchased scaffolds and related material and equipment meet or exceed current safety regulations.

XII. Safety Requirements for Scaffolds

- A.** The footing or anchorage for scaffolds shall be sound, rigid, and capable of carrying the maximum intended load without settling or displacement. Unstable objects such as barrels, boxes, loose brick, or concrete blocks shall not be used to support scaffolds or planks.
- B.** No scaffold shall be erected, moved, dismantled, or altered except under the supervision of competent persons or as requested for corrective reasons by Safety and Loss Control Personnel.

- C.** Guardrails and toeboards shall be installed on all open sides and ends of platforms more than 10 feet above the ground or floor.
- D.** Guardrails must meet OSHA Requirements, not less than 36 inches or more than approximately 42 inches high, with a midrail, when required. Supports must be at intervals not to exceed 8 feet. Toeboard and the guardrail shall extend along the entire opening.
- E.** Scaffolds and their components must be capable of supporting without failure at least 4 times the maximum intended load.
- F.** Any scaffold, including accessories such as braces, brackets, trusses, screw legs, ladders, couplers, etc., damaged or weakened from any cause must be repaired or replaced immediately, and shall not be used until repairs have been completed.
- G.** All load-carrying timber members of scaffold framing shall be a minimum of 1,500 fiber (Stress Grade) construction grade lumber.
- H.** All planking must be Scaffold Grades, or equivalent, as recognized by approved grading rules for the species of wood used.
- I.** All planking or platforms must be overlapped (minimum 12 inches) or secured from movement.
- J.** An access ladder or equivalent safe access must be provided.
- K.** Scaffold plank must extend over their end supports not less than 6 inches or more than 18 inches.
- L.** The poles, legs, or uprights of scaffolds must be plumb and securely and rigidly braced to prevent swaying and displacement.
- M.** Overhead protection must be provided for men on a scaffold exposed to overhead hazards.
- N.** Slippery conditions on scaffolds shall be eliminated immediately after they occur.
- O.** No welding, burning, riveting, or open flame work shall be performed on any staging suspended by means of fiber or synthetic rope. Only treated or protected fiber or synthetic ropes shall be used for or near any work involving the use of corrosive substances or chemicals.
- P.** Wire, synthetic, or fiber rope used for scaffold suspension shall be capable of supporting at least 6 times the intended load.
- Q.** Scaffolds shall be provided with a screen between the toeboard and guardrail, extending along the entire opening, consisting of No. 18 gauge U.S. Standard wire one-

half inch mesh or the equivalent, when personnel are required to work or pass underneath the scaffolds.

- R.** A safe distance from energized power lines shall be maintained.
- S.** Tag lines shall be used to hoist materials to prevent contact.
- T.** Scaffolds shall not be used during high wind and storms.
- U.** Ladders and other devices shall not be used to increase working heights on scaffold platforms.
- V.** Scaffolds shall not be moved while employees are on them.
- W.** Loose materials, debris, and/or tools shall not be accumulated to cause a hazard.
- X.** Employees working on suspended scaffolds shall employ a fall-arrest system.
- Y.** Scaffold components shall not be mixed or forced to fit which may reduce design strength.
- Z.** Scaffolds and components shall be inspected at the erection location. Scaffolds shall be inspected before each work shift, after changing weather conditions, or after prolonged work interruptions.
- AA.** Casters and wheel stems shall be pinned or otherwise secured in scaffold legs. Casters and wheels must be positively locked if in a stationary position.
- BB.** Tube and coupler scaffolds shall be tied to and securely braced against the building at intervals not to exceed 30 feet horizontally and 26 feet vertically.

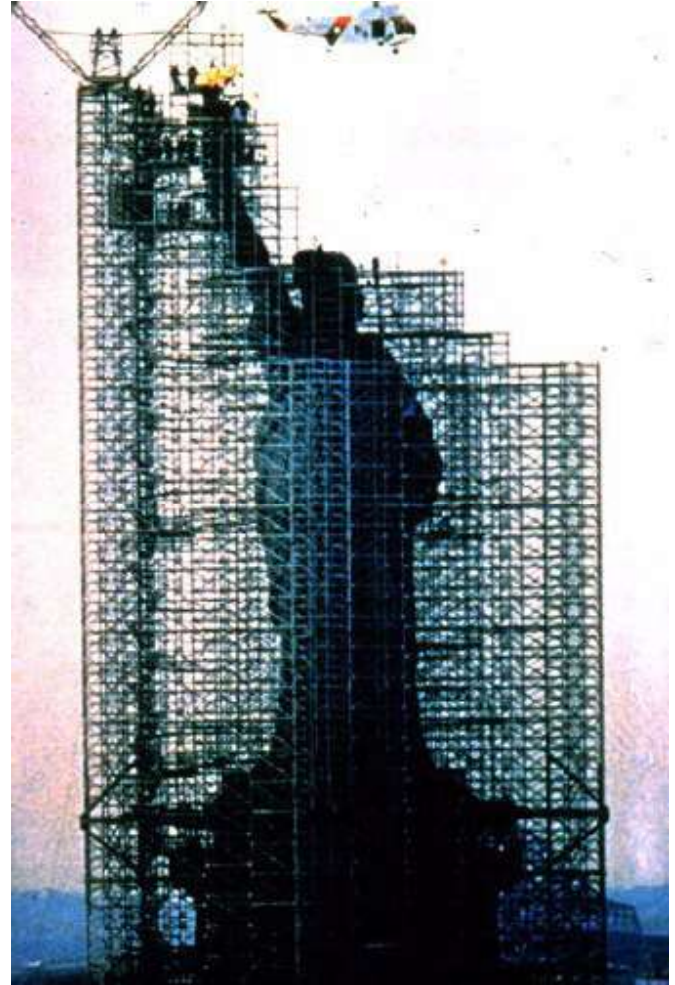
WHAT IS A SCAFFOLD?

What Is A Scaffold?

- Any **TEMPORARY** elevated platform and a supporting structure used to support personnel and/or tools and materials

Types of Scaffolds

- **SUPPORTED SCAFFOLDS** -- platforms supported by rigid, load bearing members, such as poles, legs, frames, & outriggers
- **SUSPENDED SCAFFOLDS** -- platforms suspended by ropes or other non-rigid, overhead support
- **AERIAL LIFTS** -- such as “cherry pickers” or “boom trucks”

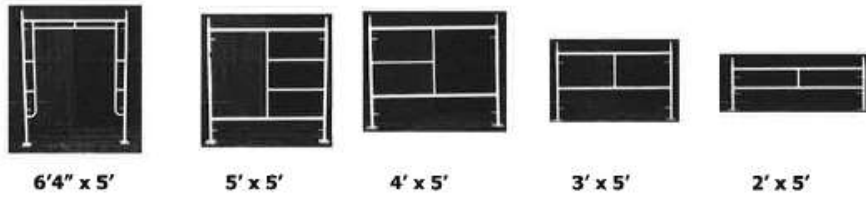


National Statistics

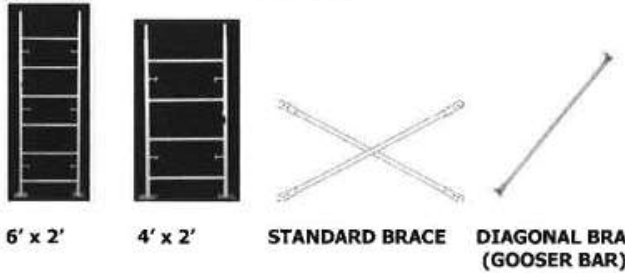
- A significant percentage of personnel in construction (65%) work from scaffolds routinely.
- There are approximately 50 fatalities related to scaffolds each year.
- There are approximately 4500 employee injuries each year as a result of using scaffolds.
- Falls from scaffolds accounted for 17% of the fatalities for falls from elevations.

SCAFFOLDING FRAMES AND BRACES

FRAMES:



BRACES:



PINS:



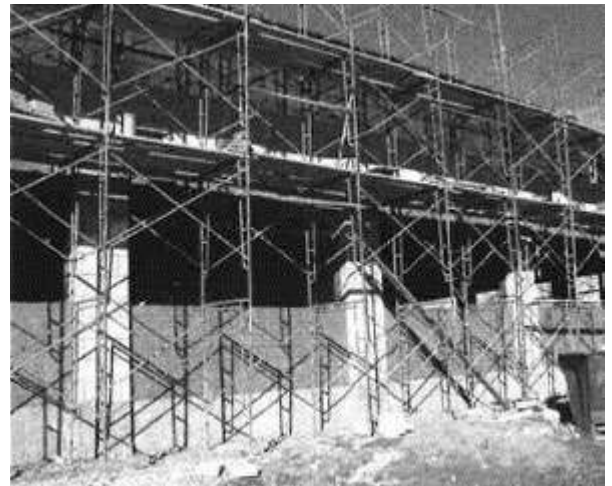
BRACING CHART:

BRACE	HEIGHT OF FRAME	LENGTH OF WALKBOARD
B-74	5' & 6'	7'
B-73	4'	7'
B-72	3'	7'
B-69	2'	7'

BRACE	HEIGHT OF FRAME	LENGTH OF WALKBOARD
B-104	5' & 6'	10'
B-103	4'	10'
B-102	3'	10'
B-109	2'	10'

GUIDELINES FOR BRACING

- **Never climb on bracing**
- Brace all scaffolds according to OSHA regulations
- Never remove bracing without authorization from a qualified person
- Bracing is different for frame, tube & clamp, and systems scaffold. Consult your supervisor if you have any questions or concerns
- Braces **must be locked** into position
- Braces must be free of any defects, i.e. holes, rust, bends, etc.
- All scaffolds must be completely braced



FOOTINGS AND FOUNDATIONS



Timber Sill



Standard Base Plate



Standard Screw Jack



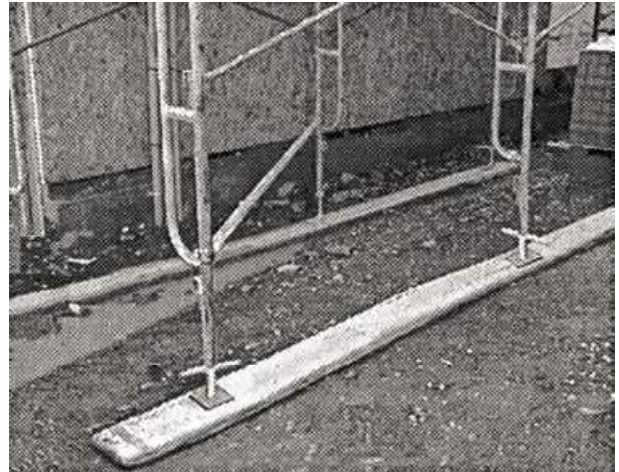
Adjustable Leg Extension

It should be apparent that few materials will support the bottom of a scaffold leg alone. Soil is not one of the materials that can resist this force. Concrete might be one material, although it is susceptible to damage also. To help alleviate this highly concentrated load in such a small area, base plates or adjustable screw jacks with base plates are used. Sometime this is adequate, and other times it is not. Normally, the base plate alone is not adequate, and it is good erection practice to always use a timber sill under the base plate.



Important factors to address in the use of sills, bases and foundations which should be considered before a project begins:

1. Always use a base plate.
2. Always use a sill on soil.
3. It is good practice to use a sill for all conditions.
4. Provide full bearing for sills.
5. Fasten sill to base plates to prevent movement.
6. Sills should be continuous and centered under at least two legs.
7. Be sure soil is compacted and sound.
8. Be aware of changing soil conditions.
9. Be aware of frozen soil conditions.
10. Brick, block, & wood scraps are not proper sills.
11. Never use blocks to correct elevations.
12. Provide equal bearing for all legs to minimize settlement.
13. Be aware of excavation adjacent to scaffold. DO NOT ALLOW IT!



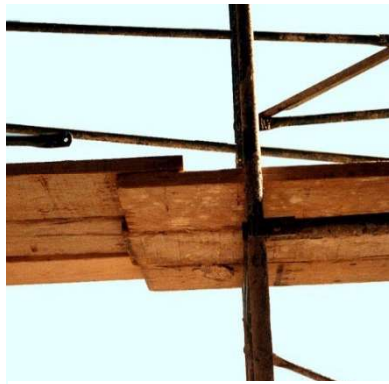
SCAFFOLDING PLATFORMS

Platforms must:

- Be fully planked or decked with no more than 1 inch gaps between adjacent units, platforms, and uprights
- Be at least 18 inches wide
- The front edge shall not be more than 14 inches from the face of the work unless guardrail/PFAS is used



THIS IS NOT A PROPERLY CONSTRUCTED SCAFFOLD



**PLANKS NOT
PROPERLY
OVERLAPPED**

Each abutted end of plank must rest on a separate support surface

Where platforms are overlapped to create a long platform, the overlap shall occur only over supports, and shall be at least 12 inches over supports, unless restrained to prevent movement

- No paint on wood platforms
- Use scaffold grade wood
- Fully planked between front upright and guardrail support
- Component pieces used must match and be of the same type
- Erect on stable and level ground
- Lock wheels and braces



PROPER SCAFFOLD ACCESS

Provide access when scaffold platforms are more than 2 feet above or below a point of access

Permitted types of access:

- Ladders, such as portable, hook-on, attachable, stairway type, and built-ins
- Stair towers
- Ramps and walkways
- May use building stairs and come out window
- **No access by cross braces**
- When using ladders, bottom rung no more than 24 inches high
- Can access from another scaffold, structure, or hoist
- Can use some end frames:



Other things to remember:

- Access must be provided to all work platforms. If access is not available from these platforms, access ladders must be provided.
- Access ladders must extend at least 3' above platform or guardrails must be provided for platform access
- Face the rungs of the ladder as you climb up and down the scaffold ladder
- Use both hands when you ascend or descend a scaffold ladder
- Clean your shoes and scaffold access rungs to avoid slipping
- Provide a rest landing at least every 30' of vertical scaffold height
- Never use a ladder to gain height from the top of a scaffold
- Never climb cross braces or diagonal braces of a scaffold

MANUALLY PROPELLED MOBILE SCAFFOLDS



MUST BE:

- Plumb, level and squared
- Braced to prevent collapse
- Casters and wheels locked to prevent movement while in a stationary position
- Platforms must not extend beyond the base supports of the scaffold, unless stability is ensured
- 4 to 1 height to base safety factor, meaning a 5' wide scaffold can be a maximum of 20' high

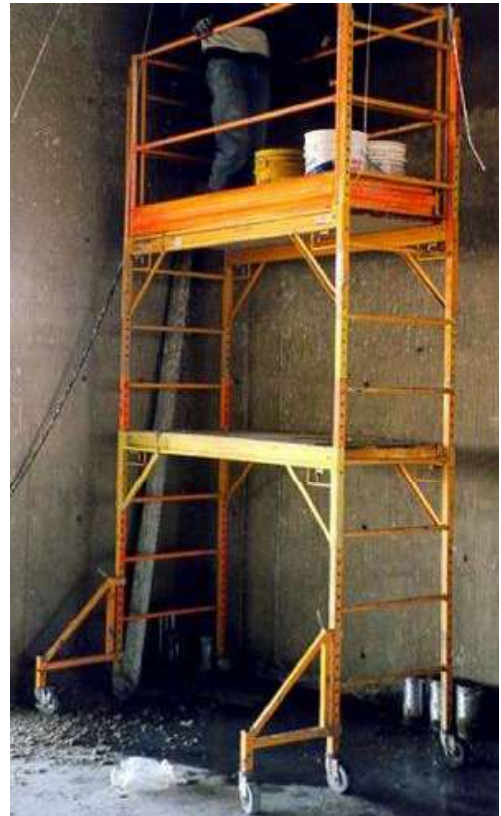
Moving the Scaffolds

Employees can't be on a moving scaffold unless:

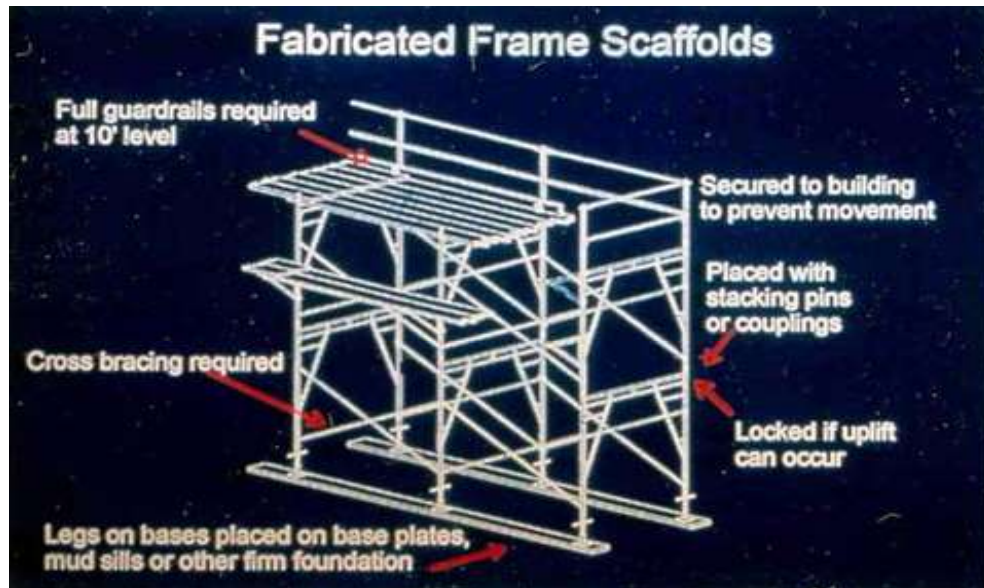
- Surface is level
- Height to base ratio is 2 to 1
- Outriggers are installed on both sides of scaffolds

Employees can't be on scaffold part beyond the wheels

Competent person must be on site to supervise



INSPECTION OF SCAFFOLDING EQUIPMENT



EXAMPLE OF A PROPERLY BUILT FRAME SCAFFOLD

Things to remember when inspecting scaffold:

Coupling and Locking Pins

- Are they missing?
- Are they bent?
- Are they in securely?

Scaffolding Frame Legs

- Are they bent?
- Are they dented?
- Are they twisted?
- Are they cracked?

Safety Locks

- Are they missing?
- Are they jammed?
- Are they twisted?

Ladders and Rungs

- Are they missing?
- Are they cracked?
- Are they dented?

Welded Areas

- Are they cracked?
- Are they rusted?

Scaffolding Planks and Boards

- Are they cracked?
- Are they securely in place?
- Is there less than 1" between them?
- Can they support the load?
- Are they free of excessive debris?

Cross Bracing

- Is bracing complete?
- Is bracing LOCKED into place?
- Are braces dented or deformed?

Guardrail Systems

- Is system complete?
- Are toeboards installed with system?
- Are all safety locks properly secured?

Scaffolding Area

- Is scaffolding clear of any excavation?
- Is scaffolding on secure footing?
- Is scaffolding area kept clear of debris and maintained in an orderly manner?

CODE OF SAFE PRACTICES - SCAFFOLDING GUIDELINES

CODE OF SAFE PRACTICES FOR

FRAME SCAFFOLDS, SYSTEM SCAFFOLDS, TUBE AND CLAMP SCAFFOLDS & ROLLING SCAFFOLDS. DEVELOPED FOR INDUSTRY BY SCAFFOLDING, SHORING & FORMING INSTITUTE (SSFI) and SCAFFOLD INDUSTRY ASSOCIATION, INC. (SIA)

It shall be the responsibility of all users to read and comply with the following common-sense guidelines which are designed to promote safety in the erecting, dismantling and use of Scaffolds. These guidelines do not purport to be all inclusive nor to supplant or replace other additional safety and precautionary measures to cover usual or unusual conditions. If these guidelines in any way conflict with any state, local, provincial, federal or other government statute or regulation, said statute or regulation shall supersede these guidelines and it shall be the responsibility of each user to comply therewith.

I. GENERAL GUIDELINES

- a. **POST THESE SCAFFOLDING SAFETY GUIDELINES** in a conspicuous place and be sure that all persons who erect, dismantle, or use scaffolding are aware of them, and also use them in toolbox safety meetings.
- b. **FOLLOW ALL STATE, LOCAL AND FEDERAL CODES, ORDINANCES AND REGULATIONS** pertaining to scaffolding.
- c. **SURVEY THE JOB SITE.** A survey shall be made of the job site by a competent person for hazards, such as untamped earth fills, ditches, debris, high tension wires, unguarded openings, and other hazardous conditions created by other trades. These conditions should be corrected or avoided as noted in the following sections.
- d. **INSPECT ALL EQUIPMENT BEFORE USING.** Never use any equipment that is damaged or defective in any way. Mark it or tag it as defective. Remove it from the job site.
- e. **SCAFFOLDS MUST BE ERECTED IN ACCORDANCE WITH DESIGN AND/OR MANUFACTURERS' RECOMMENDATIONS.**
- f. **DO NOT ERECT, DISMANTLE OR ALTER A SCAFFOLD** unless under the supervision of a competent person.
- g. **DO NOT ABUSE OR MISUSE THE SCAFFOLD EQUIPMENT.**
- h. **ERECTED SCAFFOLDS SHOULD BE CONTINUALLY INSPECTED** by users to be sure that they are maintained in safe condition. Report any unsafe condition to your supervisor.
- i. **NEVER TAKE CHANCES! IF IN DOUBT REGARDING THE SAFETY OR USE OF THE SCAFFOLD, CONSULT YOUR SCAFFOLD SUPPLIER.**
- j. **NEVER USE EQUIPMENT FOR PURPOSES OR IN WAYS FOR WHICH IT WAS NOT INTENDED.**
- k. **DO NOT WORK ON SCAFFOLDS** if your physical condition is such that you feel dizzy or unsteady in any way.

- I. **DO NOT WORK UNDER THE INFLUENCE** of alcohol or illegal drugs.

II. GUIDELINES FOR ERECTION AND USE OF SCAFFOLDS

- a. **A SCAFFOLD BASE MUST BE SET ON BASE PLATES AND AN ADEQUATE SILL OR PAD** to prevent slipping or sinking and fixed thereto where required. Any part of a building or structure used to support the scaffold shall be capable of supporting the maximum intended load to be applied.
- b. **USE ADJUSTING SCREWS** or other approved methods to adjust to uneven grade conditions.
- c. **BRACING, LEVELING & PLUMBING OF FRAME SCAFFOLDS-**
- i. Plumb and level all scaffolds as erection proceeds. Do not force frames or braces to fit. Level the scaffold until proper fit can be easily made.
 - ii. Each frame or panel shall be braced by horizontal bracing, cross bracing, diagonal bracing or any combination thereof for securing vertical members together laterally. All brace connections shall be made secure, in accordance with the manufacturer's recommendations.
- d. **BRACING, LEVELING & PLUMBING OF TUBE & CLAMP AND SYSTEM SCAFFOLDS-**
- i. Posts shall be erected plumb in all directions, with the first level of runners and bearers positioned as close to the base as feasible. The distance between bearers and runners shall not exceed manufacturer's recommendations.
 - ii. Plumb and level all scaffolds as erection proceeds.
 - iii. Fasten all couplers and/or connections securely before assembly of the next level.
 - iv. Vertical and/or horizontal diagonal bracing must be installed according to the manufacturer's recommendations.
- e. **WHEN FREE STANDING SCAFFOLD TOWERS exceed a height of four (4) times their minimum base dimension**, they must be restrained from tipping.
- f. **TIE CONTINUOUS (RUNNING) SCAFFOLDS TO THE WALL OR STRUCTURE at each end and at least every 30 feet of length in between when scaffold height exceeds the maximum allowable free-standing dimension.** Install additional ties on taller scaffolds as follows:
- i. On scaffolds 3 feet or narrower in width, subsequent vertical ties shall be repeated at intervals no greater than every 20 feet.
 - ii. On scaffolds wider than 3 feet, subsequent vertical ties shall be repeated at intervals not greater than 26 feet. The top tie shall be installed as close to the top of the platform as possible; however, no lower from the top than 4 times the scaffold's minimum base dimension. Ties must prevent the scaffold from tipping either into or away from the structure. Stabilize circular or irregular scaffolds in such a manner that the completed scaffold is secure from tipping. Place ties near horizontal members. When scaffolds are fully or partially enclosed, or when scaffolds are subjected to overturning loads, additional ties may be required. Consult a qualified person.
- g. **DO NOT ERECT SCAFFOLDS NEAR ELECTRICAL POWER LINES.** Consult a qualified person for advice.

- h. **ACCESS SHALL BE PROVIDED TO ALL PLATFORMS.** Do not climb cross braces or diagonal braces.
- i. **PROVIDE A GUARDRAIL SYSTEM, FALL PROTECTION AND TOEBOARDS WHERE REQUIRED BY THE PREVAILING CODE.**
- j. **BRACKETS AND CANTILEVERED PLATFORMS-**
 - i. Brackets for system scaffolds shall be installed and used in accordance with manufacturer's recommendations.
 - ii. Brackets for frame scaffolds shall be seated correctly with side brackets parallel to the frames and end brackets at 90 degrees to the frames. Brackets shall not be bent or twisted from normal position. Brackets (except mobile brackets designed to carry materials) are to be used as work platforms only and shall not be used for storage of material or equipment.
 - iii. Cantilevered platforms shall be designed, installed and used in accordance with manufacturers' recommendations.
- k. **ALL SCAFFOLDING COMPONENTS** shall be installed and used in accordance with the manufacturers' recommended procedure. Components shall not be altered. Scaffold frames and their components manufactured by different companies shall not be intermixed, unless the component parts readily fit together and the resulting scaffold's structural integrity is maintained by the user.
- l. **PLANKING-**
 - i. Working platforms shall cover scaffold bearer as completely as possible. Only scaffold grade wood planking, or fabricated planking and decking meeting scaffold use requirements shall be used. Planks and platforms should rest on bearers only.
 - ii. Check each plank prior to use to be sure plank is not warped, damaged, or otherwise unsafe.
 - iii. Planking shall have at least 12" overlap and extend 6" beyond center of support, or be cleated or restrained at both ends to prevent sliding off supports.
 - iv. Solid sawn lumber, LVL (laminated veneer lumber) or fabricated scaffold planks and platforms (unless cleated or restrained) shall extend over their end supports not less than 6" nor more than 18". This overhang should be guard railed to prevent access.
- m. **FOR "PUTLOGS" AND "TRUSSES" THE FOLLOWING ADDITIONAL GUIDELINES APPLY:**
 - i. Do not cantilever or extend putlogs/trusses as side brackets without thorough consideration of loads to be applied.
 - ii. Install and brace putlogs and trusses in accordance with manufacturer's instructions.
- n. **FOR ROLLING SCAFFOLDS THE FOLLOWING ADDITIONAL GUIDELINES APPLY:**
 - i. **RIDING A ROLLING SCAFFOLD IS VERY HAZARDOUS.** The SSFI and the SIA do not recommend nor encourage this practice.
 - ii. Casters with plain stems shall be attached to the frames or adjustment screws by pins or other suitable means.
 - iii. No more than 12 inches of the screw jack shall extend between the bottom of the adjusting nut and the top of the caster.
 - iv. Wheels or casters shall be locked to prevent caster rotation and scaffold movement when scaffold is in use.

- v. Joints shall be restrained from separation.
- vi. Use horizontal diagonal bracing near the bottom and at 20 foot intervals measured from the rolling surface.
- vii. Do not use brackets or other platform extensions without compensating for the overturning effect.
- viii. The top platform height **as measured from the rolling surface** of a rolling scaffold must not exceed **four (4) times the smallest base dimension**.
- ix. Cleat or secure all planks.
- x. Secure or remove all materials and equipment from platform before moving.
- xi. Do **not** attempt to move a rolling scaffold without sufficient help - watch out for holes in floor and overhead obstructions - stabilize against tipping.
- o. SAFE USE OF SCAFFOLD-**
 - i. Prior to use, inspect scaffold to insure it has not been altered and is in safe working condition.
 - ii. Erected scaffolds and platforms should be inspected continuously by those using them.
 - iii. Exercise caution when entering or leaving a work platform.
 - iv. Do not overload scaffold. Follow manufacturer's safe working load recommendations.
 - v. Do not jump onto planks or platforms.
 - vi. **DO NOT USE** ladders or makeshift devices to increase the working height of a scaffold. Do not plank guardrails to increase the height of a scaffold.
 - vii. Climb in access areas only and use both hands.
- p. WHEN DISMANTLING SCAFFOLDING THE FOLLOWING ADDITIONAL GUIDELINES APPLY:**
 - i. Check to ensure scaffolding has not been structurally altered in a way which would make it unsafe and, if it has, reconstruct and/or stabilize where necessary before commencing with dismantling procedures. This includes all scaffold ties.
 - ii. Visually inspect planks prior to dismantling to be sure they are safe.
 - iii. Do not remove a scaffold component without considering the effect of that removal.
 - iv. Do not accumulate excess components or equipment on the level being dismantled.
 - v. Do not remove ties until scaffold above has been dismantled to that level.
 - vi. Lower dismantled components in an orderly manner. Do not throw off of scaffold.
 - vii. Dismantled equipment should be stockpiled in an orderly manner.

FALL PROTECTION

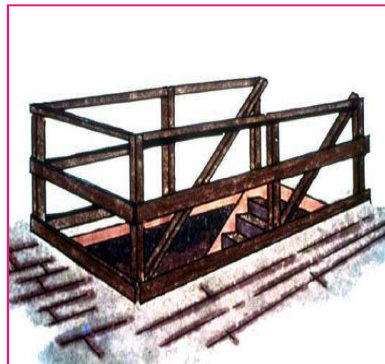
Each employee on a walking/working surface 6' or more above a lower level (exception on scaffolds, 10' or more) shall be protected from falling by a guardrail system, safety net system, or PFAS (personal fall arrest system).



Personal Fall



Arrest Systems



Guardrail System



Safety Net System

Personal Fall Arrest Systems:

Ensure that personal fall arrest systems will, when stopping a fall:

Limit maximum arresting force to 1800 pounds

- Be rigged such that an employee can neither free fall more than 6 feet nor contact any lower level
- Bring an employee to a complete stop and limit maximum deceleration distance to 3 ½ feet
- Have sufficient strength to withstand twice the potential impact energy of a worker free falling a distance of 6 feet, or the free fall distance permitted by the system, whichever is less

Guardrail Systems:

Guardrail systems and their use shall comply with the following:

- Top edge height of top rails shall be 42" \pm 3"
- Midrails or their equivalent, when used, shall be installed at a height midway between the top edge of the guardrail system and the walking/working surface
- Other structural members shall be installed so that there are no openings more than 19"
- Toeboards shall be installed with guardrail system to prevent fall hazards
- Toprails and midrails shall be at ¼" nominal diameter or thickness

FALL PROTECTION POLICY

I. Purpose

To identify and evaluate fall hazards to which employees will be exposed, and to provide specific training as required by the Occupational Safety and Health Administration (OSHA) Fall Protection Standard, 29 CFR 1926, Subpart M.

II. Responsibility

- a. Employer
 - i. F. Richard Wilton Jr., Inc. will provide fall protection to affected employees, and ensure all employees understand and adhere to the guidelines set forth by this policy.
- b. Program Manager
 - i. Performing routine safety checks of work operations
 - ii. Enforcing company safety policies and procedures
 - iii. Correcting any unsafe conditions immediately
 - iv. Training employees and supervisors in recognizing fall hazards and the use of fall protection systems
 - v. Maintain record of employee training, equipment issue, and fall protection systems used at Wilton jobsites
 - vi. Investigate and document all incidents that result in employee injury
- c. Employees
 - i. Understand and adhere to procedures outlined in this program
 - ii. Follow instructions of supervisors or any competent person
 - iii. Bring to management's attention any hazardous condition or practices that may cause injury
 - iv. Report any incident that causes injury to an employee, regardless of the nature of the injury

III. Policy

- a. Fall protection is required when working at heights of 6' or greater. (For scaffolding, fall protection is needed at heights of 10' or more above a lower level)
- b. Fall protection can be accomplished by providing guardrail systems, safety nets, personal fall arrest equipment or safety monitoring systems. Only shock absorbing lanyards or retractable lifelines will be used in conjunction with full body harnesses
- c. Personal fall arrest equipment shall be inspected prior to each use
- d. Lanyards shall not be hooked onto itself unless designated for that purpose; cross arm straps/anchor straps must be used
- e. Anchor points must be capable of withstanding 5400 pounds of tensile strength per worker tied off
- f. All employees shall be trained in accordance to the applicable OSHA standard

IV. Personal Fall Arrest Systems

- a. Effective January 7, 1998, only full body harnesses are acceptable
- b. All horizontal and static lines shall be designed by an engineer or load tested in

accordance to 29 CFR 1926 Subpart M Appendix C

- c. Copies of the design criteria and installation instructions for horizontal and static lines shall be submitted to F. Richard Wilton Jr., Inc. management
- d. Connectors shall be drop forged, pressed or formed steel, or made of equivalent materials
- e. Connectors shall have a corrosion-resistant finish, and all surfaces and edges shall be smooth to prevent damage to nylon materials
- f. Dee rings and snaphooks shall have a minimum tensile strength of 5000 pounds
- g. Dee rings and snaphooks shall be proof tested to a minimum tensile load of 3,600 pounds without cracking, breaking, or taking permanent deformation
- h. On suspended scaffolds or similar work platforms with horizontal lifelines which may become vertical lifelines, the devices used to connect to a horizontal lifeline shall be capable of locking in both directions on the lifeline
- i. Snaphooks shall be a locking type designed and used to prevent disengagement of the snaphook
- j. Lanyards and vertical lifelines shall have a minimum breaking strength of 5,000 pounds.
- k. When vertical lifelines are used, each employee shall be attached to a separate lifeline
- l. Lifelines shall be protected against being cut or abraded
- m. Self-retracting lifelines which automatically limit free fall distance of 2 feet or less shall be capable of sustaining a minimum tensile load of 3000 pounds applied to the device with the lifeline or lanyard in the fully extended position
- n. Lanyards shall be capable of sustaining a minimum tensile load of 5000 pounds applied to the device with the lanyard in the fully extended position
- o. Anchorages used for attachment of personal fall arrest equipment shall be independent of any anchorage being used shall be capable of supporting at least 5400 pounds per employee attached
- p. The attachment point of the body harness shall be located in the center of the wearer's back near shoulder level
- q. Body harnesses and components shall be used only for employee protection, not to hoist materials
- r. Personal fall arrest equipment and components subjected to impact loading shall be immediately removed from service and shall not be used again for employee protection until inspected and determined by a competent person to be undamaged or suitable for reuse
- s. The employer shall provide for prompt rescue of employees in the event of a fall
- t. Personal fall arrest equipment shall be inspected prior to each use for wear, damage and other deterioration, and defective components shall be removed from service
- u. Personal fall arrest equipment shall not be attached to guardrail systems
- v. When a personal fall arrest system is used at hoist areas, it shall be rigged to allow the movement of the only as far as the edge of the walking/working surface
- w. All personal fall arrest systems must be kept in a separate storage container as to prevent damage when not in use.

V. Guardrail Systems

- a. The height of top rails shall be 42", +/- 3"
- b. Mid rails shall be installed at least 21"
- c. Guardrails systems shall be capable of withstanding, without failure, a force of at least

200 pounds applied within 2" of the top edge, in any outward or downward direction, at any point along the top edge. When the 200 pounds test load is applied in a downward direction, there should be no more than 2" of deflection

- d. Mid rails shall be capable of withstanding, without failure, a force of at least 150 pounds applied in any downward or outward direction
- e. Guardrail systems shall be so surfaced as to prevent injury to an employee from punctures or lacerations, and to prevent snagging of clothing
- f. The ends of all top rails and mid rails shall not overhang, except where such overhang does not constitute a projection hazard
- g. Steel banding and plastic banding shall not be used as top rails or mid rails
- h. If wire rope is used for top rails it shall be flagged at not more than 6' intervals with high visibility material
- i. When guardrail systems are used at hoisting areas, a chain, gate or removable guardrail section shall be placed across the access opening between guardrail sections when hoisting operations are not taking place
- j. When guardrail systems are used at holes, they shall be erected on all unprotected sides or edges of the hole
- k. When guardrail systems are used around holes used for the passage of materials, the hole shall have not more than two sides provided with removable guardrail sections to allow the passage of materials. When the hole is not in use.
- l. it shall be closed over with a cover, or a guardrail system shall be provided along all unprotected sides or edges
- m. When guardrail systems are used around holes which are points of access (such as ladderways), they shall be provided with a gate, or be so offset that a person cannot walk directly into the hole
- n. Guardrail systems used on ramps and runways shall be erected along each unprotected side or edge

VI. Safety Net Systems

- a. Safety nets shall be installed as close as practicable under the walking/working surface on which employees are working, but in no case more than 30' below such level
- b. When nets are used on bridges, the potential fall area from the walking/working surface to the net shall be unobstructed
- c. Safety nets shall be installed with sufficient clearance under them to prevent contact with the surface or structures below when subjected to an impact force equal to a drop test (referenced in section E of Safety Net Systems)
- d. Safety nets and their installations shall be capable of absorbing an impact force equal to that produced by the drop test
- e. The drop test shall consist of a 400 pounds bag of sand 30" +/- 2" in diameter dropped into the net from the highest walking surface at which employees are exposed to fall hazards, but not from less than 42" above that level
- f. Defective nets shall not be used
- g. Safety nets shall be inspected at least once a week for wear, damage, and other deterioration. Defective components shall be removed from service. Safety nets shall also be inspected after any occurrence which could affect the integrity of the safety net system
- h. Materials, scrap pieces, equipment, and tools which have fallen into the safety net shall

- be removed as soon as possible from the net and at least before the next work shift
- i. The maximum size of each safety net mesh opening shall not exceed 36 square inches, nor be longer than 6" on any side, and the opening, measured center-to-center of mesh ropes or webbing, shall not be longer than 6"
- j. All mesh crossings shall be secured to prevent enlargement of the mesh opening
- k. Each safety net (or section of it) shall have a border rope for webbing with a minimum breaking strength of 5,000 pounds

VII. Fall Protection Plan

This option is available only to employees engaged in leading edge work who can demonstrate that it is infeasible, or it creates a greater hazard to use conventional fall protection equipment. The fall protection must conform to the following provisions:

- a. The fall protection plan shall be prepared by a qualified person and developed specifically for the site where the leading-edge work and plan must be maintained up to date
- b. Any changes to the fall protection plan shall be approved by qualified person
- c. A copy of the fall protection plan with all approved changes shall be maintained at the jobsite
- d. The implementation of the fall protection plan shall be under the supervision of a competent person
- e. The fall protection plan shall document the reasons why the use of conventional fall protection systems (guardrail systems, personal fall arrest systems, or safety net systems are infeasible or why their use would create a greater hazard)
- f. The fall protection plan shall include a written discussion of other measures that will be taken to reduce or eliminate the fall hazard for workers who cannot be provided with protection from the conventional fall protection systems. For example, the employer shall discuss the extent to which scaffolds, ladders or vehicle mounted work platforms can be used to provide a safer working surface, thereby reduce the hazard of falling
- g. The fall protection plan shall identify each location where conventional fall protection methods cannot be used. These locations shall then be classified as controlled access zones
- h. Where no other alternative measure has been implemented, the employer shall implement a safety monitoring system in conformance with the applicable OSHA Standard

VIII. Training

- a. All employees who may be exposed to fall hazards must receive training on how to recognize such hazards, and how to minimize their exposure to them
- b. Training shall be conducted by a competent person
- c. The program manager shall maintain a record of employees who have received training and dates of training.
- d. Employees shall be retrained when there is reason to believe that an employee does not understand the elements of fall protection
- e. Circumstances where retraining is required include, but are not limited to, changes in the workplace show previous training is obsolete, changes in the types of fall protection

systems or equipment to be used render previous training obsolete, and a demonstration by an employee that displays insufficient knowledge of fall protection systems

LADDER SAFETY

LADDER ACCIDENTS CAN BE PREVENTED:

- Most ladder accidents are the result of careless or improper ladder usage
- A fall from a ladder can disable you for the rest of your life, cut off your earning power for a long time or even kill you.
- They can be avoided by working safely on and around ladders.

THE MOST COMMON CAUSES OF LADDER ACCIDENTS ARE:

- Overreaching on ladders.
- Failing to secure ladders.
- Climbing one-handed.
- Standing on the top rung or platform.
- Using worn or damaged ladders.
- Leaving tools on ladders.

DO NOT CLIMB A LADDER BEFORE INSPECTING FOR:

- Cracks in the wood.
- Loose or damaged rungs.
- Broken locks or pulleys.
- Frayed or worn ropes.

SECURE YOUR LADDER BY:

- Tying the top and bottom of the ladder to a secure location.
- Using ladder stays if the top of the ladder must lean against a window or other surface that cannot support the weight.
- Having a person hold the ladder if you cannot secure it with ropes or straps.

OVERREACHING IS THE MOST COMMON CAUSE OF LADDER FALLS

- Keep your belt buckle inside the rails of the ladder.
- When you can no longer reach from this position, get down and move the ladder.
- Do not stand higher than the second step from the top of a stepladder or the third rung from the top of a portable ladder.

WRITTEN HAZARD COMMUNICATION PROGRAM

I. INTRODUCTION

F. Richard Wilton Jr., Inc. is firmly committed to providing all of its employees with a safe and healthy work environment. All company employees have a right to know about the hazardous chemicals they work with and could be exposed to, as well as what precautions must be taken to avoid illness and injury when handling these chemicals. F. Richard Wilton Jr., Inc. provides information about hazardous chemicals through our Hazard Communication program, which includes container labeling, Material Safety Data Sheets (MSDS), and employee information and training.

Wilton Safety Personnel will have the overall responsibility for coordinating the hazard communication program for F. Richard Wilton Jr., Inc. Upon request to our employees, their designated representatives, the Assistant Secretary of Labor for Occupational Safety and Health and the Director of the National Institute for Occupational Safety and Health, Wilton Safety Personnel will make our written hazard communication program available.

II. LIST OF HAZARDOUS CHEMICALS

Wilton Safety Personnel will compile a list of all hazardous chemicals that will be used on jobsites by reviewing container labels and Material Safety Data Sheets. This list will be updated as necessary and will be kept with job foreman.

III. LABELING

F. Richard Wilton Jr., Inc. requires every container of hazardous chemicals on a jobsite to be properly labeled. The labels will list:

- a. The contents of the container
- b. Appropriate hazard warnings
 - i. To further ensure employees are aware of the chemical hazards of materials used in their work areas, our company policy is to label all secondary containers.
 - ii. Secondary containers are to be labeled with either an extra copy of the manufacturer's label or with a generic label listing the container's contents and appropriate hazard warnings.

Wilton Safety Personnel will review the company labeling procedures periodically and will update labels as required.

IV. MATERIAL SAFETY DATA SHEETS

Wilton Safety Personnel is responsible for establishing and monitoring the company MSDS program. He will ensure procedures are developed to obtain all necessary MSDSs and will review incoming MSDSs for new or significant health and safety information.

Copies of all MSDSs for all hazardous chemicals to which employees are exposed or potentially exposed will be kept with the jobsite foreman and also onsite, either in a F. Richard Wilton Jr., Inc. gang box or the superintendent's trailer.

V. EMPLOYEE TRAINING

Employees are to attend a training session on hazardous chemicals in their work area at the time of their initial work assignment. The training session will cover the following:

- a. The requirements of the OSHA Hazard Communication Standard (29 CFR 1910.1200)
- b. A review of the chemicals present in their workplace operations
- c. The location and availability of our Written Hazard Communication program, a list of hazardous chemicals, and Material Safety Data Sheets
- d. How to detect the presence or release of hazardous chemicals in the workplace
- e. Physical and health hazards of the chemicals in the work area
- f. The measures employees can take to protect themselves from these hazards, including specific procedures implemented by F. Richard Wilton Jr., Inc., such as appropriate work practices, emergency procedures, and personal protective equipment to be used.
- g. An explanation of our hazard communication program, including how to read labels and Material Safety Data Sheets to obtain appropriate information
- h. Location of the MSDSs and this Written Hazard Communication Program

When a new type of product is introduced to the jobsite or the chemical composition of a product changes, Wilton Safety Personnel will review the above items as they are related to the new chemicals.

VI. NON-ROUTINE TASKS

Periodically, employees are required to perform non-routine tasks. Prior to starting work on such projects, each affected employee will be informed by the job foreman about hazards to which they may be exposed and appropriate protective and safety measures.

VII. INFORMING OTHER EMPLOYEES

To ensure employees of other contractors have access to information on the hazardous chemicals at a jobsite, the responsibility of the job foreman is to provide other contractors the following information:

- a. Where the MSDSs are available
- b. The name and location of the hazardous chemicals to which their employees may be exposed and any appropriate protective measures required to minimize their exposure
- c. An explanation of the labeling system used at the jobsite.

PERSONAL PROTECTIVE EQUIPMENT (PPE) POLICY

I. Purpose

To ensure that, where applicable, the appropriate and necessary personal protective equipment (PPE) is selected and used by all employees. F. Richard Wilton Jr., Inc.'s PPE Policy shall meet and exceed the provisions of the Virginia Occupational Safety and Health (VOSH) and Occupational Safety and Health Act (OSHA).

II. Policy

a. Hard Hats

- i. Hard hats are required to be worn at all times by every employee working for/with F. Richard Wilton Jr., Inc.
- ii. Hard hats shall be worn with suspension installed properly.
- iii. Hard hats shall be worn in accordance with the manufacturer's recommendations.
- iv. It shall be the responsibility of the employee to maintain the hard hat in good repair.
- v. Damaged or cracked hard hats shall be immediately replaced.
- vi. The painting of hard hats is prohibited.

b. Foot Protection

- i. In the interest of foot protection and the prevention of foot injuries, boots shall be worn at all times on the job site.
- ii. Employees found not wearing the proper foot protection shall be removed from the site until such time the required foot protection is obtained.
- iii. Open toe shoes or tennis shoes are prohibited.
- iv. Employees exposed to chemicals are required to wear substantial shoes. A substantial shoe is a shoe or boot that has an upper made entirely of firm leather or firm man-made leather. Shoes must cover at least the entire front, top, sides, and back of the foot and have a sole at least 1/4" thick.
- v. Visitors and vendors are not required to wear safety shoes, but in the interest of their safety, they are required to wear quality shoes (i.e. a closed toe leather shoe).

c. Eye and Face Protection

- i. Eye protection will be worn at all times, no exceptions.
- ii. In addition to safety glasses, additional protection is required when a person is engaged in work of a known hazard. The following jobs require additional protection:
 1. Gas welding, cutting or burning – Welding hood with correct shade lens
 2. Cutting, grinding, or deburring of metal – Full face shield
 3. Cleaning with compressed air – Plastic or rubber goggle
 4. When handling corrosive or hazardous liquids that have recommendations for additional protection – Rubber splash-proof goggle and/or full-face shield

- iii. Eye and face protection shall be kept clean and in good repair. The use of defective eye and face protection is prohibited, and any such equipment shall be immediately repaired or replaced.
- iv. Dark tinted lenses are only to be worn when working outside or in welding areas.
- v. Employees that do not have prescription safety glasses with side shields must wear non-prescription safety glasses (OTG's) or goggles that fit over their prescription glasses.

d. Hearing Protection

- i. In the interest of hearing conservation, approved hearing protection shall be worn properly at all times by all persons working in or visiting areas of any jobsite or facility designated as a high noise area.
- ii. For the purpose of this policy, a high noise area is defined as any area in which the sound level is 90 decibels (dB) or greater as measured on the A scale (dBA) of a standard sound level meter, or an impact noise in excess of 140 decibels (dB) peak sound level.
- iii. When controls fail to reduce sound levels below 90 dBA or above, signs shall be posted at all entrances to identify the area as one in which hearing protection is required.
- iv. The types of approved hearing protection are as follows:
 - 1. Bilsom Whisper hearing protection or similar (Ear insert)
 - 2. E.A.R. or similar foam hearing protection (Ear insert)
 - 3. Issued over the ear hearing protection (Earmuff)
 - 4. Any hearing protective device prescribed by an Otolaryngologist for employees who have special ear or hearing problems.
- v. Modification or alterations to issued hearing protection is not permitted.

CLOTHING REQUIREMENTS

I. Purpose

To define the clothing requirements for jobsites

II. Policy

- A. Employees shall present a professional appearance at all times.
- B. Hi Viz shirts and/or vest shall be worn at all times on site
- C. Employees shall wear highly visible safety apparel with reflective stripes when working near motor vehicle traffic or other motorized equipment.
- D. Employees must wear clothing that is suitable for the work they are performing.
- E. Employees shall wear long pants with no large tears or holes that expose the skin. **Shorts are not permitted.**
- F. Pants that are oversized or baggy shall be belted and not create a tripping hazard. No sweatpants shall be worn.
- G. No restrictively tight pants or leggings shall be worn.
- H. Short sleeves shall be a minimum of four inches. **Tank tops or half shirts are not permitted.**
- I. Shirts shall not display images or language that is considered to be offensive to others.
- J. Workers must wear shoes or boots with slip-resistant and puncture-resistant soles, safety toed shoes are recommended to prevent crushed toes when working with heavy rolling equipment of falling objects, tennis shoes are not permitted.
- K. Gloves shall be worn when there is potential for hand injuries, i.e. when handling material with sharp or jagged edges.
- L. General Contractors and/or Owners may have additional requirements per jobsite that must be adhered to in addition to those required by our Company.
- M. Employees will be asked to leave the jobsite if not in compliance with this policy.

GENERAL HOUSEKEEPING GUIDELINES

I. Purpose

To establish the requirement and responsibilities for routine housekeeping to ensure work areas are maintained in a clean manner and present an acceptable appearance.

II. Policy

- A. Housekeeping assists in the prevention of the following hazards:
 - 1. Slips, trips, and falls
 - 2. Fire
 - 3. Chemical exposures
- B. Housekeeping shall be the responsibility of **EACH EMPLOYEE/TEMP LABOR/SUBCONTRACTOR** of the company.
- C. Each supervisor shall ensure there are an adequate number of trash receptacles for their jobsite.
- D. All scrap, waste material, and rubbish will be removed and disposed of in receptacles or dumpster on a daily basis.
- E. All scrap material and debris shall be kept in neat piles until disposal or removal.
- F. The work areas shall be kept in an orderly fashion. Do not allow drink containers, food wrappings and other trash to accumulate.
- G. All material will be protected by weather as necessary and stored safely in designated areas.
- H. Materials shall be stored in a fashion as to prohibit stacks and piles from collapse, slide, or fall.
- I. All tools should be stored in a designated area when not in use and at the end of each shift.
- J. Tools and equipment subject to falling shall be secured.
- K. Compressed gas cylinders shall be stored and secured valve end up, with the valves closed, regulators removed and protective caps in place.
- L. Rags or other debris contaminated with flammable or combustible material shall be disposed of in approved safety waste cans.
- M. Pathways/walkways/roads will be kept free of debris, trash, and obstruction at all times.
- N. Keep all walkways and stairways clear of trash/debris and other materials such as tools and supplies to prevent tripping.
- O. Ensure enough lighting is provided for workers to see and to prevent accident. If such a condition exists, report it immediately to the jobsite supervisor.

FIRE PROTECTION POLICY

I. Purpose

To establish fire prevention methods to reduce the potential for fires and outline the requirements for fire protection in accordance with OSHA's Fire Protection and Prevention Standard, 29 CFR 1926.35.

II. Policy

A. General

1. All firefighting equipment must be clearly marked and accessible.
2. Smoking shall be prohibited at or in the vicinity of operations which constitute a fire hazard and shall be conspicuously posted: **"No Smoking or Open Flame."**
3. Housekeeping guidelines shall be observed at all times.
4. All flammable and combustible liquids shall be stored in approved metal safety cans.
5. Store flammable and combustible materials in designated storage areas and a 20 lbs. ABC fire extinguisher must be located not more than 75 feet from the storage area.
6. No open flames or smoking within 75 feet of a flammable material storage area.
7. All heavy equipment must be equipped with a minimum of a 5 lbs. ABC fire extinguisher.
8. Fire watches shall be established when conditions warrant.
9. A fire extinguisher or water can shall be accessible when performing tasks that generate sparks near combustible materials.
10. Internal combustion engine powered equipment shall be located so the exhausts are well away from combustible materials.

B. Fire Extinguishers

1. Fire extinguishers shall be readily accessible at all times.
2. All fire extinguishers shall be inspected regularly.
3. The inspection shall include ensuring the:
 - a. Hose and nozzle is unobstructed
 - b. The pressure gauge is showing a full charge
 - c. There is a pull pin and that the pin is sealed
 - d. There is no evidence of damage
4. Any extinguisher discharged or not passing visual inspections shall be sent out for service or replaced.

5. All dry chemical fire extinguishers shall be hydrostatically inspected every 12 years.
6. All CO2 fire extinguishers shall be hydrostatically tested every 5 years.

C. Training

1. All employees shall be trained in the proper use of fire extinguishers prior to job assignment.
2. Operation of Fire Extinguishers: **PASS**
 - a. **P**ull pin
 - b. **A**im at the base of the fire
 - c. **S**queeze handle
 - d. **S**weep from side to side
3. All employees shall be informed of the locations of fire extinguishers in their work area.

D. Open Yard Storage

1. Combustible materials shall be piled with due regard to the stability of piles and in no case higher than 20 feet.
2. Driveways between and around combustible storage piles shall be at least 15 feet wide and maintained free from accumulation of rubbish, equipment, or other articles or materials. Driveways shall be spaced so that a maximum grid system unit of 50 feet by 150 feet is produced.
3. The entire storage site shall be kept free from accumulation of unnecessary combustible materials. Weeds and grass shall be kept down and a regular procedure provided for the periodic cleanup of the entire area.
4. Method of piling shall be solid wherever possible and in orderly and regular piles. No combustible material shall be stored outdoors within 10 feet of a building or structure.
5. Portable fire extinguishing equipment, suitable for the fire hazard involved, shall be provided at convenient, conspicuously accessible locations in the yard area. Portable fire extinguishers shall be placed so that maximum travel distance to the nearest unit shall not exceed 100 feet.

INJURY NOTIFICATION PROCEDURE

I. Purpose

To provide Supervision an outline of action to be taken when an employee suffers an injury or becomes ill while in the workplace

II. Policy

A. General

1. In the event of a serious injury or illness requiring medical treatment or hospitalization, the Supervisor's **first** responsibility is to ensure the employee receives the best medical treatment available
2. If an employee is injured and feels they need to be seen by a physician, the Supervisor shall send the employee to a designated medical facility
3. When an injury or illness occurs, the Supervisor shall take the following action:
 - a. If the injury or illness is of minor nature, the Supervisor or employee trained in first aid shall accompany the patient to the first aid station, treat accordingly, and complete the First Aid Log.
 - b. If the injury or illness appears to be serious, the extent of the injury is unknown or is **life-threatening**, contact the local emergency medical services or Medical Response Team (If applicable).
4. No injured or ill employee shall leave the job site without first notifying their Supervisor.
5. F. Richard Wilton Jr., Inc. shall be notified before sending an employee to an off-site medical facility
6. F. Richard Wilton Jr., Inc. Safety Coordinator shall be immediately notified in the event of a fatality or an injury requiring hospitalization
7. In the event of a fatality or injury requiring hospitalization, F. Richard Wilton Jr., Inc. shall utilize the employee's personnel folder to ensure proper notification of all involved parties
8. Only a member of F. Richard Wilton Jr., Inc. management shall notify OSHA in the event of a fatality or incident requiring notification
9. Employees who are to receive medical treatment at a medical facility are to follow company procedure drug screening
10. Any employee receiving medical treatment at a medical facility shall not return to work until a written release from a Physician is obtained and turned in to the Safety Personnel

B. Records

1. For the mutual protection of the employee and the company, accurate medical records shall be kept of all injuries and illnesses suffered and the treatment administered
2. The Virginia State Employer's First Report must be filled out completely and a copy forwarded to F. Richard Wilton Jr., Inc.'s Safety Personnel within 24 hours for any employee receiving medical treatment off site
3. When an employee is injured and then treated by first aid at the jobsite or facility, the First Aid Log Form shall be completed and kept at locations where first aid supplies are kept

ACCIDENT INVESTIGATION PROCEDURE

I. Purpose

The purpose of accident investigation is:

To establish the exact and factual cause of the accident (the accident is being investigated, not the injury)

To determine what steps must be taken to prevent that type of accident or similar accident from reoccurring

To establish a method of investigation all serious injuries, unusual or alleged accidents where the potential of serious injury, or the potential of costly damage to equipment was high

To provide guidelines for management and supervision on methods of accident investigation

II. Policy

A. General

1. All injuries that result in **“Lost Time”** shall be investigated by a designated F. Richard Wilton Jr., Inc. safety representative
2. All accidents that result in damage to equipment or vehicles (over \$1000.00 in repair cost) shall be investigated by the employee’s Supervisor or Foreman using the Accident Investigation Form
3. The Accident Investigation Form shall be forwarded to F. Richard Wilton Jr., Inc. management within 24 hours of completion
4. F. Richard Wilton Jr., Inc.’s Safety Personnel shall inform appropriate parties of the Accident Investigation and also keep a copy on file

B. Timeliness of Investigation

1. The accident investigation shall be started as soon as possible after the accident has been reported
2. If an accident occurs during regular working hours, the investigation shall begin immediately
3. If an accident occurs during holidays, weekends, or after normal working hours, a preliminary investigation shall be made by the highest-ranking member of supervision present at the time of the accident

4. If an accident occurring during holidays, weekends, or after normal working hours requires hospitalization or a death, supervision shall immediately contact the jobsite foreman and a member of F. Richard Wilton Jr., Inc. management

C. Investigation Procedure

1. Secure any evidence
2. Separate any witnesses to ensure that each can give their individual accounts of the events without being biased by the views and opinions of others
3. Interview the employee(s) involved in the incident
4. Take pictures, make sketches, or obtain any other relevant information
5. Complete and forward a copy of the Accident Investigation Form to the jobsite Foreman and Safety Personnel

D. Guidelines for Conducting Accident Investigations

1. Remember the goal is to determine what caused the accident, not to place blame
2. The investigation should be started as soon as possible after the incident
3. The Accident Investigation Form should be used when conducting the investigation
4. Personal data of employee involved:
 - i. **WHO**
 1. Full name, home address, and telephone number
 2. Social Security number
 3. Experience, physical and emotional condition, hours worked, attitude towards safety, training of job at time of accident, etc.
5. Accident data:
 - i. **WHERE**
 1. Location where the incident occurred
 2. Picture of location
 - ii. **WHAT**
 1. Type of accident: Indicate the nature of the accident- fall, struck by object, caught between
 2. Description of equipment and tools – make, manufacturer, model, condition, guarding, inspection, etc.
 3. Describe what task the employee was doing
 4. Environment – conditions of housekeeping, lighting, access, etc.
 5. Other factors such as, proper use of PPE or contribution by a co-worker
 6. Statement and interviews
 - iii. **WHEN**
 1. Time of accident
 2. Date and time
 3. Weather, rain, snow, temperature, etc.

iv. **WHY**

1. Possible cause of accident: using wrong tool, equipment malfunction, lack of knowledge

E. Reports

1. All accident investigations conducted using the Accident Investigation Form shall be forwarded to the Safety Coordinator
2. The Safety Coordinator will distribute a final Accident Investigation Report to the following:
 - i. President
 - ii. Vice President
 - iii. Project Manager
 - iv. Jobsite Foreman

ELECTRICAL SAFETY POLICY

I. Purpose

To provide general guidance to ensure the safety of employees when working with or around electricity

II. Policy

- A. Employees who work on or near exposed energized and de-energized parts of electrical equipment shall be trained to recognize potential hazards
- B. Employees shall follow all electrical safe work practices to ensure personal protection as well as protection of others which shall include adherence to OSHA's Electrical Safe Work Practices standard 29 CFR 1910.333-39
- C. The following rules apply to all employees and temp labor and subcontractors when working on, near, or with exposed electric conductors and equipment:
 - 1. Employees who work on or near exposed energized and de-energized parts of electrical equipment shall wear and use personal protective clothing and equipment for the hazard/risk to which they are exposed.
 - 2. Jewelry: Conductive articles of jewelry and clothing shall not be worn anytime. This includes finger rings, earrings, necklaces/chains and bracelets. Non-conductive belt buckles shall be worn or metal belt buckles removed.
 - 3. Watches: Conductive watches (metal bands, casing) shall not be worn anytime.
 - 4. Barriers/Barricades/Signs: Barricades shall be used in conjunction with safety signs or other accident prevention tags where necessary to prevent access to exposed energized parts. Barriers/barricades/signs will not be required if the employee is in attendance and working on the exposed energy sources and can control the work area for the entire time the area is under repair or maintenance.
- D. If doors or hinged panels have the potential to swing into the employee, or the area is congested and poses a hazard to the employee or others in the work area, the doors shall be blocked, if possible, or barricades shall be used to isolate the area
- E. If the door can conceal the person from view, then it shall be secured open and appropriate barricades shall be used
- F. Extension cords shall be designed for hard or extra hard usage and designated as such.
- G. Repairing the insulation of electrical cords with electrical tape is not permitted
- H. Supervisors and employees shall ensure a properly working Ground Fault Circuit Interrupter (GFCI) is being used whenever connecting to a receptacle outlet

LOCKOUT-TAGOUT PROCEDURE

I. Purpose

To establish the requirements for isolation of both kinetic and potential electrical, chemical, thermal, hydraulic and pneumatic and gravitational energy prior to equipment repair, adjustment or removal, in accordance with OSHA Standard 29 CFR 1910.147, the control of hazardous energy

II. Policy

A. General

1. Each employee/temp worker/subcontractor shall comply with this program
2. The Lockout-Tagout procedure will be used whenever maintenance, repairs or service is to be performed on any equipment or machinery
3. The purpose of the Lockout-Tagout procedure is to ensure:
 - a. The safety of any employee against the accidental start-up of equipment or machinery on which or with which they may be working
 - b. Machines or equipment are isolated from all potential hazardous energy

B. Training

1. All "Authorized," employees shall receive proper training in the recognition of hazardous energy, and the methods necessary to isolate those energy sources
2. All "Affected," employees shall be instructed on the procedure of Lockout-Tagout, the recognition of control procedures, and the importance of not attempting to start-up or use equipment that has been locked or tagged out
3. All "Other," employees who work in an area where Lockout-Tagout may be utilized will be instructed on the procedure of Lockout-Tagout, the recognition of control procedures, and the importance of not attempting to start-up or use equipment that has been locked or tagged out

C. Shut Down Procedure

1. Prepare for Shut-down:
 - a. Notify all "Affected," employees that servicing or maintenance is required on a machine or equipment and the machine or equipment must be shut down and the Lockout-Tagout system is going to be utilized
 - b. The "Authorized," employee will refer to shut down procedure or manufacturer's instructions to identify the type of magnitude of the energy that particular machine or equipment utilizes
 - c. The "Authorized," employee must understand the hazards of the energy and will know the methods to control the energy
2. Shut down the Equipment
 - a. If the machine or equipment is operating, shut it down by the normal stopping procedure
3. Isolate the Equipment

- a. De-activate the energy isolating device(s) at the main identified power source so that the machine or equipment is isolated from the energy source(s). This, depending on the source of stored energy, i.e. electrical, mechanical, hydraulic, pneumatic, or water pressure, can be accomplished by:
 1. **Electrical**-turn off the circuit breaker or disconnect switch feeding electrical energy to the device
 2. **Mechanical**-manually reposition the machine so as to dissipate all stored energy **contained** in springs, heavy suspended members, or other devices which may unexpectedly release their stored energy, install blocking to prevent unexpected movement
 3. **Hydraulic**-turn off **the** hydraulic power unit which pump the fluid to the device
 4. **Pneumatic**-close the valve feeding air to the device
 5. **Water Pressure**-close the valve feeding water pressure to the device
4. Lockout and/or Tagout the energy isolating devices with assigned individual lock(s) and tag employing the following procedures:
 - a. Applying Lockout-Tagout Devices
 1. Each "Authorized," employee will be provided with a lockout device, a personal lock to be affixed to the device, and a tagout device to be used when confronted with devices not accepting a lockout mechanism, the lockout device (where usable) is to be placed on the energy isolating device in such a manner as to prevent unauthorized re-energization of the system while the lockout device is present. Examples include:
 - a. Placing of the lockout device into the activating lever of an electrical device
 - b. Placing of the lockout device into lockout receptacle found on valves when such receptacles are present. In the event an energy-isolating device is encountered that does not accept a lockout device, the "Tagout," method will be employed. The "Authorized," employee will place their "Tag," on the energy-isolating device. The tag will indicate the name of the person placing the tag and the date the tag is so placed. No employee will remove or attempt to remove either the lockout device or "Tag," placed by another employee on an energy isolating device
 5. Verify Isolation of Equipment
 - a. After ensuring no personnel are exposed, and as a check on having disconnected the energy sources, operate the push button or other normal operating controls and observe the results to make certain the equipment will not operate
 - b. The equipment is now locked out or tagged out

D. Restoring Equipment

1. After the servicing and/or maintenance is complete and equipment is ready for

- normal production operations, check the area around the machine or devices, operate the energy isolating devices to restore energy to the equipment
2. After all tools have been removed from the machine or equipment, guards have been reinstalled and employees are in the clear, remove all lockout/tagout devices, and operated the energy isolating device to restore energy to the machine or equipment

E. Procedure Involving More Than One Person

1. If more than one individual is required to lockout or tagout equipment, each shall place their own personal lockout device or tagout device on the energy isolating device(s)
2. Lockout devices shall accept multiple locks
3. In cases where lockout is not an alternative, tagout will be employed to render device safe from unexpected release of operation, each employee shall place his own tag on the energy isolating device
4. When multiple tags, placed by different employees, are affixed to an energy isolating device, it is prohibited for any one employee to remove the tag placed by another employee

RESPONSIBILITIES

I. Purpose

Outline the safety responsibility of Management, Foremen, Supervisors, Employees, and all Temp Labor and Subcontractors.

To establish the “**First Rule**,” that each employee is expected to follow in order to help perform his or her daily tasks in a safe manner.

II. Policy

A. General

1. Each employee shall adhere to all safety rules established in F. Richard Wilton Jr., Inc.’s Safety Manual and other safety policies as they are developed.
2. Management, Foremen, and Safety Manager will coordinate and assist in every manner possible toward the mutual goal of a safe work environment.
3. The “**First Rule**,” of the Company is “**Do Your Job Safely**.” If you do not understand how to do a job safely, stop and ask your supervisor. Proceed with a job only after you fully understand all safety requirements. It is the responsibility of each employee to follow this rule. It is the responsibility of each member of supervision to make certain this rule is known and is being followed.
4. Safety is a responsibility that must be shared equally and without exception.

B. Management

1. Management is responsible for development, implementation and monitoring of F. Richard Wilton Jr., Inc.’s Safety and Health Program.
2. Ensure all safety administration supplies, equipment and other necessary and relevant safety material required for each project is available and delivered to site prior to the commencement of start-up.
3. Establish and ensure there is an open line of communication between employees and management.
4. Develop technical guidance and the internal programs to identify and remove hazards.
5. Maintain an accident and record keeping system, investigate all accidents and take corrective actions to eliminate accident causes.
6. Ensure compliance with all applicable federal, state and local safety standards.

C. Foremen and Supervisors

1. Be held directly accountable for the safe operations at their jobsites.
2. Require all F. Richard Wilton personnel and subcontractor personnel under his

- control adhere to all safety rules and regulations.
3. Coordinate with all temp labor and subcontractors to ensure their employees know, understand, and follow safety rules, policies and procedures pertaining to the work being performed.
 4. Ensure that required safety equipment and PPE are provided and used for each job.
 5. Conduct and submit a completed Job Hazard Analysis before beginning work.
 6. Conduct task observations and audits on identified high hazard tasks to ensure that proper procedures are being followed.
 7. Observe new hire employees closely until confident of workers ability to perform assigned duties safely.
 8. Maintain continuous visual monitoring for hazardous conditions.
 9. Encourage participation, safety suggestions and maintain open communication with employees.
 10. Complete and submit the First Report of Injury within 24 hours of an injury that requires medical treatment for F. Richard Wilton employees.
 11. Conduct thorough accident investigations, complete and submit all required paperwork as outlined in the Accident Investigation section of this manual.
 12. Conduct "Tool Box Talks," or Safety Meetings geared to various aspects of safety or related job site shop hazards.

D. Employees, Temp Labor and Subcontractors

1. All employees must strictly abide by F. Richard Wilton's Safety and Health policies.
2. Refuse and/or report unsafe work to their supervisor.
3. Report hazardous practices/procedures and take an active part in protecting themselves and their fellow workers.
4. Report any and all injuries to their supervisor.
5. Implement principles of accident prevention in daily work.
6. Keep work areas as clean and orderly as possible at all times.
7. Attend weekly Safety Meetings or Tool Box Training.

FORMAL SAFETY AUDITS

I. Purpose

To establish the Formal Safety Audit Program and to define the Formal Safety Audit.

II. Policy

A. General

1. A safety audit is designed to:
 - a. Provide a uniform method of conduction regularly scheduled inspections of jobsites to ensure compliance to OSHA standards, Company policies and rules, site or facility policies, and general safety practices
 - b. Illustrate the degree of emphasis various jobsites place on providing and maintaining a healthy and safe environment
 - c. Illustrate physical evidence of Management's commitment to the Safety Program and provide Management the opportunity to ensure a safe and healthy workplace

B. Formal Site Safety Audit

1. The purpose of the Formal Safety Audit is to ensure compliance to OSHA standards, Company policies and rules, site or facility policies, and general safety practices
2. The jobsite will have an audit at least bi-monthly
3. The audit will be conducted by F. Richard Wilton Jr., Inc.'s Safety Personnel or another designated competent person
4. The audit will focus on:
 - a. General site conditions
 - b. Compliance with F. Richard Wilton Jr., Inc. specific safety rules and policies
 - c. Compliance with personal protective equipment (PPE)
 - d. Compliance to fall protection requirements
 - e. Ensuring a designated competent person is on-site
 - f. Ensuring all required documentation is being submitted
5. During the audit, deficiencies found will be noted and effort to fix aforementioned deficiencies will be made immediately
6. Any operation found deficient or considered to be immediately dangerous to life safety shall be instantly shut down until such time discrepancies are corrected
7. Upon completion of the audit the on-site Supervisor and Foreman will be informed of verbally of issues found
8. A written audit report will be submitted and kept on file
9. Any items noted on the audit as "Open," shall be corrected and written documentation shall be submitted upon correction

TRAINING REQUIREMENTS

I. Purpose

To outline the training requirements for employees working at jobsites.

To improve workplace safety and health awareness through the development and implementation of education and training programs for employees.

II. Policy

A. General

1. New employees shall be provided with certain training prior to job assignment and when assigned to a new task that training has not been received.
2. Training for all personnel shall be on going.
3. Training shall be conducted by persons who have knowledge of the subject being taught.
4. Criteria for training:
 - a. Explain the goals and objectives
 - b. Relate the training to the interests, skills, and experiences of the employees
 - c. Outline the main points to be presented during the training session
 - d. Follow up with employees to ensure training was effective
5. Employees who do not demonstrate knowledge or understanding shall be retrained.

B. General Training Requirements

1. All employees shall be trained on the following:
 - a. Site safety rules and policies
 - b. Proper use and care of personal protective equipment (PPE)
 - c. Hazard Communication
 - d. Site evacuation procedure
 - e. Accident and hazard reporting procedure

C. Tasks Requiring Training

1. All employees engaged in the following task or operations shall be trained and/or certified.
 - a. Fall Protection
 - b. Ladder and scaffold awareness
 - c. Aerial and scissor lifts
 - d. Forklift
 - e. Powder actuated tools
 - f. Respiratory protection
 - g. Laser operations
 - h. Confined space
 - i. Crane operations

- j. Control of hazardous energy (Lockout/Tagout)
- k. Steel erection
- l. Lull, bobcat, or excavators

D. Operations Requiring a Competent Person

- 1. The following operations require a competent person to be onsite:
 - a. Crane and rigging operations
 - b. Steel erection
 - c. Scaffold erection
 - d. Confined space

E. Safety Meetings

- 1. Safety meetings shall be held weekly, at a minimum.
- 2. Supervisor should have a set day and time to hold the safety meeting.
- 3. Training shall be relevant to the tasks of employees.
 - a. Safety meetings are designed to: Provide a designated time to conduct required training
 - b. Give opportunities for employees to focus on specific hazards, operations, and attitudes.
 - c. Instill safety awareness in each employee.
 - d. Toolbox Talks/Safety Meetings shall be conducted by a supervisor, lead employee, or a person knowledgeable of the subject.
- 4. Copies of the sign in sheet shall be submitted to F. Richard Wilton Jr., Inc. upon completion.

VOLUNTARY RESPIRATOR USE

OSHA Requirement for Voluntary Respiratory Usage (1910.134 Appendix D)

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to you. Sometimes employees may wear respirators to avoid exposures to hazards, even if the amount of hazardous substances does not exceed the limits set by OSHA standards. If the respirators are provided to you by F. Richard Wilton Jr., Inc. for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure the respirator itself does not present a hazard.

You should do the following:

1. **Read and heed all instructions** provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirator's limitations.
2. **Choose respirators certified for use** to protect against the contaminant or concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
3. **Do not wear your respirator** into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will NOT protect you against gases, vapors, or very small particles of fumes or smoke.
4. **Keep track of your respirator** so that you do not mistakenly use someone else's respirator.

By my signature below, I certify that I have read, understand and agree to the information provided on this form.

Signature

Printed Name

Date

SANITATION GUIDELINES

I. Purpose

To provide guidance to ensure compliance to the standards of sanitation for all F. Richard Wilton Jr., Inc. projects.

II. Policy

A. General

1. Potable drinking water shall be provided and placed in a location readily available to all employees.
2. The water shall be suitably cool and in sufficient amounts, taking into account the air temperature, humidity and the nature of the work performed to meet the needs of all employees.
3. The water shall be dispensed in single-use drinking cups or by fountains. The use of a common drinking cup is prohibited.
4. Water shall not be dipped from containers. Any container used to distribute drinking water shall be clearly marked as to the nature of its contents and not used for any other purpose.
5. Where single cups (to be used only once) are supplied, both a sanitary container for the unused cups and a receptacle for disposing of the cups shall be provided.
6. Drinking water containers shall be constructed of materials that maintain water quality. Drinking water containers shall be refilled daily, shall have a secure cover, and cleaned regularly.
7. Signs to indicate water is unsafe and not to be used for drinking, washing or cooking purposes shall identify outlets for non-potable water.
8. There shall be no cross-connection or the potential for cross connecting between a system furnishing potable water and a system furnishing non-potable water.
9. F. Richard Wilton Jr., Inc. will ensure a toilet and hand washing facilities are available.
10. Toilet and hand washing facilities shall be maintained in accordance with appropriate health and sanitation practices.
11. Toilet facilities shall be adequately ventilated, appropriately screened, have self-closing doors that can be latched from the inside and shall be constructed to ensure privacy.
12. Toilet and hand washing facilities shall be readily accessible to all employees, accessibly located, and in close proximity to each other.
13. Disposal of "wastes" from toilet facilities shall not cause unsanitary conditions.

POLICY FOR MOBILE DEVICES ON JOBSITES

Purpose

The purpose of this policy is to establish a procedure to reduce injuries directly or indirectly related to using mobile devices on worksites. There are many hazards associated with using mobile devices on a worksite. It can distract users from the hazards associated with their work tasks and their surroundings, and it can distract other workers in the area.

Restricting the use of mobile devices on a worksite will increase the level of concentration of workers. If workers are more focused on their job, the quality of their work will improve, and the number of incidents associated with the distractions caused by using mobile devices will decrease.

Application

This policy applies to all Employees, Temp Labor, and Subcontractors entering the worksite.

Types of Mobile Devices

This policy includes all mobile devices including, but not limited to, smart phones, cell phones, tablets, notebooks, iPads, MP3 players, and iPods.

Company Rules

- The use of mobile devices is not permitted while operating equipment, while working on any aerial work platforms, stilts, lifts, scaffolding, or while performing work activities. Per OSHA guidelines, the operator must not engage in any practice or activity that diverts his/her attention while engaged in operating equipment.
- The use of mobile devices is not permitted around flammable or combustible material.
- The use of games, social media, or non-work-related communication during work hours is strictly prohibited except in the case of emergency, or during scheduled breaks.
- Should a project site have further restrictions on mobile device use, those rules must be followed while on their site.
- No photos containing confidential information will be shared online or posted on social media, except to the extent protected by applicable law.
- Microphones on mobile devices shall not be used to record confidential information, except to the extent protected by applicable law.
- Theft of, or damage to, an employee's personal cell phone or device while working is not the responsibility of F. Richard Wilton Jr. Inc.

Permitted Uses

- At acceptable times, workers are permitted to use mobile devices when they are in designated safe areas. These areas are specific to each jobsite. Ask your supervisor for clarification.
- Supervisors are permitted to use mobile devices in the construction trailer, in the site office, or at a designated safe area, provided it is away from general work activities.
- Supervisors are permitted to use mobile devices on site for work-related communication, provided they do so in the safest manner possible.

Discipline

Anyone who violates this policy will be subject to disciplinary measures, up to and including dismissal, depending on the circumstances and the company policy.

DISCIPLINARY ACTION POLICY

I. Purpose

To establish guidelines that are to be used at all job sites to appropriately discipline employees who have violated any safety policy, procedure, or rule.

II. Policy

A. General

- F. Richard Wilton Jr., Inc.'s safety rules and policies must be strictly enforced. Policy violations may result in disciplinary action, up to and including termination of employment.
- It is the responsibility of each member of Supervision and each subcontractor to ensure the safety rules and policies are made available to their employees and said employees remain in compliance with F. Richard Wilton Jr., Inc.'s Safety Program.
- The action of disciplining employees will be left to the discretion of the Management and Supervision, but enforcement will be carried out in a non-discriminatory manner .
- The company reserves the right implement discipline in a manner deemed appropriate in its sole discretion. However, the company may follow the following progressive discipline guidelines:
 - Documented verbal warning which may be accompanied by retraining.
 - Written warning , which may be followed by extended retraining.
 - Termination is the final stage of the progressive discipline guidelines.

The company reserves the right to implement discipline in its sole discretion, including but not limited to immediate termination where deemed warranted.

B. Verbal Warnings

Management, Supervision, and other designated persons may issue verbal warnings to employees that commit minor infractions or violations of safety rules and policies. Continued violations or

verbal warnings may lead to more stringent action.

- All verbal warnings must be documented with the following information noted:
 - Date of the warning
 - Reason why warning was issued or infraction
 - Corrective measures taken/retraining
 - Acknowledgment by the employee

C. Written Warnings

- Management or Supervisors may issue written warnings for any of the following reasons:
 - Repeated minor violations of safety rules or policies.
 - A single violation of safety rules or policies that could have resulted in injury to themselves, other employee(s), or could have caused damage to equipment or property.
- Written warnings must be documented and must include the following:
 - Date of infraction
 - Dates of previous warnings or infractions
 - Nature and severity of infraction(s)
 - Corrective measures taken/retraining
 - Acknowledgement by the employee

- D.** This policy is not intended to interfere with, restrain, or prevent employees from communicating regarding wages, hours, or other terms and conditions of employment, or engaging in a lawful strike or work stoppage, or otherwise to interfere with employees' rights under the National Labor Relations Act. The Company will not construe this policy in a way that limits such rights. Employees have the right to engage in or refrain from activities protected by the National Labor Relations Act.

COMPANY VEHICLE / DRIVER POLICY & PROCEDURES

Employees designated as “Authorized Drivers” must hold a valid driver’s license which is not suspended or revoked. Brannan Inc. t/a F. Richard Wilton, Jr., Inc. (“Wilton” or the “company”) may also review an Authorized Driver’s driving record at any time and may periodically run a Motor Vehicle Record (MVR) to verify a clean driving record, as a requirement of our insurance carrier, at least annually.

Authorized Drivers are responsible for operating their assigned vehicle in a safe, legal, and professional manner in furtherance of the business of the company. Authorized Drivers must know and abide by all driving laws in all areas where they operate their assigned vehicle. Authorized Drivers must maintain a current valid driver’s license issued for the class of the vehicle being operated. If for any reason an Authorized Driver’s license is revoked, suspended, or restricted, it is mandatory that the Fleet Administrator at Wilton be notified immediately.

The authorization of driving a company vehicle may be withdrawn at the sole discretion of the company at any time, including for any of the following reasons (without limitation):

- Abuse or misuse of the vehicle or failure to comply with the rules and procedures stipulated in this company policy.
- A driving record which becomes deficient, thus making the driver unable to be covered under insurance. Under certain circumstances this may be grounds for dismissal.
- Conviction or a guilty plea to driving a company vehicle under the influence of alcohol or an illegal controlled substance.

THE FOLLOWING RULES MUST BE FOLLOWED BY ALL DRIVERS:

1. Company vehicles must be driven in a safe and professional manner.
2. All driving laws must be followed.
3. Drivers are expected to drive defensively at all times.
4. Seat belts must be used by **ALL** occupants of a company vehicle at all times without exception. It is the driver’s responsibility to ensure that all occupants fasten their seatbelts prior to operating the company’s vehicle. Any malfunctioning seatbelt should be reported for repair immediately.
5. The transport of a hitchhiker, stranger, or other person not authorized to be transported in a company vehicle is prohibited.
6. Authorized Drivers are prohibited from driving under the influence of drugs or alcohol, including prescription drugs which inhibit the ability to drive.
7. Texting while driving is not allowed.
8. Cell phones should be used only on “hands free” while operating a company vehicle. Calls should be ideally made or returned only when the company vehicle is parked in a safe location. No employee will be required to conduct Company business over the phone while

driving.

9. Should a company vehicle you are driving experience mechanical issues, you should (if required) find a safe place to stop the vehicle and notify your supervisor as quickly as possible.
10. All traffic violations or parking tickets received while driving a company vehicle must be reported to the Fleet Administrator (Scott Brannan) as quickly as possible.
11. The Authorized Driver is financially responsible for any parking or traffic violations incurred while operating a company vehicle.
12. Only designated Authorized Drivers are permitted to operate a company vehicle.
13. The inside of company vehicles should be kept clear of clutter and debris and should be maintained as clean as possible.
14. Accidents involving company vehicles should be reported immediately to the Fleet Administrator and "Guidelines on Reporting an Accident" should be followed and the "Wilton Accident Report" should be filled out and submitted to the Fleet Administrator.
15. Know the clearance required for the company vehicle you are driving – including its contents – **and be sure to observe clearances.**
16. Transport hazardous substances, such as gasoline, chemicals, construction materials etc., only in approved containers and with extreme caution.
17. When transporting debris in the back of trucks, the debris must be secured, covered, and tied down as required by law. The Authorized Driver is responsible for any item falling from the company vehicle.
18. When transporting materials, equipment, scaffolding, ladders, etc. to or from suppliers or jobsites, the material should be secured so as not to have it fall or blow out of the company vehicle. The Authorized Driver is responsible for any item falling from the company vehicle.
19. **RED FLAGS:** As per Virginia law, a red or orange fluorescent warning flag is required on the extremities of a commercial motor vehicle's load if it extends more than four inches beyond the sides or four feet beyond the rear of the vehicle. The flag must be at least 18 inches in both length and width. If the load is two feet wide or less, one flag is required at the extreme rear, but if it's wider than two feet, two flags are required. The flag's purpose is to warn other road users that the vehicle is transporting an oversized load so they can navigate safely. If the load on a non-commercial vehicle extends more than four feet beyond the rear of the bed or body then the vehicle is required to display a red flag at least 12 inches in length and in width at the end of the load in such a position as to be clearly visible at all times from the rear of the load. **HOWEVER**, given that our material often has sharp edges, we require that any material extending beyond the truck bed have some sort of red flag. Obviously follow state law as outlined above if it extends over four feet. Further, contact the Fleet Administrator if you will be traveling in other states to ensure applicable law is followed.
20. Company vehicles should never be used to tow or push another vehicle.
21. When backing up larger trucks, such as a flat bed or dump truck, whether loaded or empty, whenever possible safely use a designated spotter.

22. Insurance cards, registration documents, and blank Accident Report Form(s) should be kept in the glove box of company vehicles at all times.
23. Company vehicles should not be left unlocked or in dangerous areas.
24. The Authorized Driver of company vehicle may not allow a company vehicle to be leased, sold or borrowed.
25. Company vehicles must remain available to the company at all times during company business hours.
26. Tracking devices may be placed on company vehicles, which are to remain on the vehicle at all times, and tampering or removing of such devices may result in immediate termination. If a company vehicle is tracked after regular business hours in an unexpected location, the company may report the vehicle as stolen.
27. Company vehicles may not be used for business activities for other companies.
28. Company vehicles may not be driven out of the United States.
29. The acceptance of any form of compensation from any individual for carrying passengers or material is prohibited.

TRAFFIC VIOLATIONS

Speeding violations and/or accident history may exclude a driver from being covered by company-provided insurance and may make them ineligible to drive a company vehicle. Should you for any reason, receive a summons for a traffic violation or a parking ticket related to the operation of a company vehicle, it is your sole responsibility to pay it as soon as possible. All traffic violations and parking tickets should be reported to the Fleet Administrator as quickly as possible.

A driver with three (3) moving violations or any combination of three accidents and/or moving violations within a three-year period will be evaluated and may be prohibited from driving a company vehicle. Any driver with a violation associated with drugs or alcohol will be prohibited from driving a company vehicle until the "State" reissues a current and valid driver's license. This type of violation may also be grounds for immediate termination at the discretion of management. Notwithstanding the above, the company reserves the right to prohibit an employee from driving a company vehicle in its sole discretion.

EZ PASS

Most company vehicles are equipped with an EZ Pass. These passes are to be used for company use only and may not be transferred to any other vehicle. If the vehicle you are driving is NOT equipped with an EZ Pass, take note of that fact and submit appropriate toll receipts for reimbursement.

GAS CARDS

If you have access to or are assigned a company gas card, it is for company use only and for gas only. Use of the card for any other purpose unless authorized by the Fleet Administrator will be considered a violation of this policy. Use of the card for personal purposes is not allowed. Note that gas cards are sometimes assigned temporarily based on the location of the job you are working on.

PARKING

Check with job supervisors regarding parking availability for jobsites prior to going onsite. Specific areas may be assigned to our company vehicles for parking or for loading/off-loading. Failure to park in specified areas is not allowed. Any parking ticket(s) received due to failure to park in specified area will be your responsibility.

ASSIGNED COMPANY VEHICLES:

ELIGIBILITY TO DRIVE AN ASSIGNED COMPANY VEHICLE

Employees eligible for assignment of a company vehicle are selected at the sole discretion of the company. Prior to vehicle assignment, eligible employees must prove that he/she has a valid driver's license which is not suspended or revoked. Brannan Inc. t/a F. Richard Wilton Jr. Inc. ("Wilton" or the "Company") may also review your driving record at any time and may periodically run a Motor Vehicle Record (MVR) to verify a clean driving record, as a requirement of our insurance carrier, during your assignment of a vehicle.

WITHDRAWAL OF COMPANY DRIVING PRIVILEGE

The privilege of driving a company vehicle may be withdrawn at the sole discretion of the company at any time, including but not limited to the following reasons:

- Abuse or misuse of the company vehicle or failure to comply with the rules and procedures stipulated in this company policy.
- A driving record which becomes deficient during the course of operating a company vehicle which, under certain circumstances, may be grounds for dismissal.
- Conviction or a guilty plea to driving a company vehicle under the influence of alcohol or an illegal controlled substance.
- If an eligible driver has a long-term disability, his/her assigned vehicle could be reassigned to another driver. Upon recovery from the disability and return to work, the driver may be assigned another vehicle.
- Note that sometimes vehicles may be assigned on a temporary basis with no intent or implication of a long-term benefit.

PERSONAL USE OF A COMPANY VEHICLE

Company vehicles, while intended for Wilton business use, may also be used by the assigned driver for commuting to and from work and for limited personal use. No other drivers other than the assigned driver are permitted to operate a company vehicle. Company vehicles should not be left unlocked or in dangerous areas. Company vehicles must remain available to the company during company business hours. During extended vacations or other extended time off, an employee using a company vehicle to commute must ensure that the company vehicle is accessible to the Fleet Administrator, including the vehicle's keys. The assigned driver of a company vehicle must provide the address where the company vehicle will be garaged and update the Fleet Administrator if this address changes. Tracking devices may be placed on company vehicles, which are to remain on the vehicle at all times, and tampering or removing of such devices may result in immediate termination. If a company vehicle is tracked after business hours in an unexpected location, the company may report it stolen.

VEHICLE MAINTENANCE

Every driver of a company vehicle is expected to maintain the cleanliness of his or her assigned vehicle and to keep it in a safe operating condition, adhering to manufacturer's recommendations regarding service, maintenance, and inspection. Each driver of a company vehicle should regularly ensure the tire pressures, gas and other fluids of a company vehicle are at appropriate levels. Company vehicles should not be operated with any defect that would prevent safe operation and any such defects or damage should be reported to the Fleet Administrator as soon as possible. Maintenance schedules outlined in your company vehicle's owner manual should be adhered to and documentation retained that prescribed service work was completed. Particular attention should be paid to the maintenance requirements for keeping the warranty of your company vehicle in effect. Company vehicle maintenance should be performed by approved service providers as established by the Fleet Administrator and it is your responsibility to make sure all necessary maintenance on a company vehicle is performed. Preauthorization is required for any major repair to any vehicle.

LICENSE PLATES

License plate stickers are renewed the month due and will be delivered to you the last week of the renewal month for you to place on the company vehicle. Please note the month of renewal of your assigned company vehicle and if the sticker is not received, contact the office. Keep the company vehicle registration card in the glove box.

ATTACHMENTS TO VEHICLES

Trailer towing – Company vehicles should not be fitted with a trailer hitch to pull a trailer or boat without prior authorization from the Fleet Administrator. In addition, company vehicles should not be used to push another vehicle.

Bumper stickers – No bumper or window stickers should be affixed to a company vehicle unless a prior consent is received from the Fleet Administrator.

INSURANCE

Insurance cards and Wilton Accident Form(s) should be kept in the glove box at all times. Only you, the employee, are authorized to drive the vehicle. The company does not maintain automobile liability insurance coverage for any accidents, claims, demands, suits, damages, etc. occurring or arising out of the operation or use of a company vehicle in a manner which is in violation of this policy.

STOLEN VEHICLES

If a company vehicle is stolen, report the theft immediately to the local police and to the Fleet Administrator. Obtain a copy of the police report filed. Maintain one copy for your personal files and submit another to the Fleet Administrator.

Fleet Administrator:

Scott Brannan- Office (804)798-1637, Cell (804)347-4442

ACCIDENTS INVOLVING COMPANY VEHICLES

GUIDELINES FOR REPORTING AN ACCIDENT:

1. If anyone is hurt, call for medical assistance.
2. Immediately following an accident, stop and investigate what damage might have occurred to the vehicle.
3. Get the names and addresses of the owner(s) and driver(s) involved, license number and registration number of the car(s) involved and the names and addresses of any passengers in the vehicles connected with the accident.
4. Get the name of the other party's insurance company and insurance policy number.
5. Get the names and addresses of witnesses, if any.
6. If law enforcement officers are present at the scene, note their names, badge and precinct numbers. If no police officers are present, try to have one called to the scene of the accident.
7. Express no opinion as to who was at fault. Give no information except as required by law enforcement officers. Do not admit negligence or liability.
8. Sign no statements for anyone except an identified representative of the Wilton insurance company covering the company vehicle. Do not attempt settlement, regardless of how minor.
9. Contact the Fleet Administrator within the first 24 hours following the accident so a preliminary accident report may be taken.
10. Keep a copy of the company's authorized accident reporting form for your records.
11. Complete all reports required by local law enforcement and state motor vehicle authorities. If you need help in completing these reports, request help from your local police department, state motor vehicle office, or the Fleet Administrator.
12. If any demand, claims or summons is served to an employee involved in an accident with a company vehicle asserting liability against the employee or the company, contact the company Fleet Administrator immediately.
13. If the collision involves an unattended vehicle, you must attempt to notify the owner. If that is not directly possible, attach a note to the vehicle asking the owner to contact you. Notify the police immediately telling them that you have attempted to make contact with the owner.
14. Take a photograph of the scene of the accident if possible.

There are NO EXCEPTIONS to the above requirements. Failure to comply with this procedure could have serious consequences for Wilton and your association with the company.

DRUG FREE WORKPLACE POLICY

I. Purpose

F. Richard Wilton Jr., Inc. is committed to providing a safe work environment and to fostering the well-being and health of its employees. This commitment is jeopardized when any F. Richard Wilton Jr., Inc. employee illegally uses drugs (including improperly used prescription medications) or alcohol on the job, comes to work with these substances present in their body, or possesses, distributes or sells drugs in the workplace.

You must notify your supervisor if you are taking any drug or substance that would render you unable to complete your assigned work in a safe and proper manner.

F. Richard Wilton Jr., Inc. has the right to conduct inspections of all F. Richard Wilton Jr., Inc. property and premises and to implement and conduct drug and alcohol screening tests at any time.

Violating the drug-free policy, failure to cooperate, refusing to be tested, providing false information, or omitting information may subject you to additional disciplinary action, including termination.

II. Policy

- a. **Supervisor/Management Responsibility Training:** Foremen will be trained on how to implement and enforce this policy. The training is not intended to train foremen to be drug and alcohol abuse experts, counselors or to conduct medical evaluations. Foremen are not required to undertake any actions beyond their normal supervisory responsibilities.
- b. **Employee Education:** F. Richard Wilton Jr., Inc. will provide drug and alcohol awareness information to all employees. This will include the company's policy on drug and alcohol abuse, and the availability of counseling and treatment through the Employee Assistance Program.
- c. **Responsibilities of Coworkers**
 - i. All employees are expected to be actively involved in ensuring that they work in a safe environment. If employees suspect that a co-worker or other person is jeopardizing a safe work environment based on alcohol or drug use, or otherwise, they should contact their supervisor or Human Resources.
 - ii. F. Richard Wilton Jr., Inc. is committed to promoting and maintaining a drug-free working environment for all its employees and to promoting and protecting the safety, health and well-being of all employees.
- d. **Pre-Employment/Pre-Jobsite Startup Testing**
 - i. Job applicants who are conditionally offered a position may undergo testing for the presence of illegal drugs as a condition of employment.
- e. **Post-Accident Drug Testing**

- i. Employees **WILL** be tested if an accident occurs on company premises or time and results in an injury to anyone that requires outside medical attention, or when the employee is determined to have caused or contributed to the accident. However, employees will not be tested unless there is a reasonably possibility that illegal drug or alcohol use could have contributed to the accident.
- f. **Reasonable Suspicion Drug Testing**
 - i. If F. Richard Wilton Jr., Inc. has reasons to suspect, based upon observed employee behavior, credible reports or other credible information, any employee may be under the influence of alcohol or illegal drugs, or may have otherwise violated this policy, they will be given a drug or alcohol screening.
- g. **Follow-Up Drug Testing**
 - i. Employees who have violated this policy but were given the opportunity to keep their jobs on the basis of successful rehabilitation will be subjected to unannounced tests to ensure no further positive tests.
- h. **Drug Testing Assurances**
 - i. Only certified drug testing laboratories will be used.
 - ii. A strict chain-of-custody procedure will be used to ensure integrity of each specimen.
 - iii. All positive drug screens will be confirmed by a second test using a different chemical process, and only those samples that test positive on both, the screen and confirmation, will be considered a positive.
 - iv. All information, interviews, reports, statements and drug test results, written or otherwise are confidential communications, unless authorized by state or federal laws, rules or regulations.
- i. **Employee Assistance Program (EAP)**
 - i. Richard Wilton Jr., Inc. recognizes drug and alcohol abuse can be successfully treated and is committed to helping employees who suffer from these problems, while holding them responsible for the own recovery. F. Richard Wilton Jr., Inc. offers an Employee Assistance Program (EAP) benefit for employees and their dependents. The scope of this benefit is providing information and referral numbers to the employee. It is the employee's responsibility to ensure the treatment facility provides F. Richard Wilton Jr., Inc. with the necessary documentation to establish compliance with the employee's rehabilitation obligations. If the EAP determines a referral to a treatment center is required, the employee is responsible for the full cost of these services.

The intent of this policy is to offer a helping hand to those who need it, while sending a clear message that illegal drug use and alcohol abuse are incompatible with employment at F. Richard Wilton Jr., Inc.

COMPANY ELECTRONIC EQUIPMENT POLICY

Use of Equipment

All Company property – including computers, laptops, cell phones, and iPads – must be used properly and maintained in good working order. Employees who lose, steal, or misuse Company property may be personally liable for replacing or repairing the item.

The Company reserves the right, at all times and without further notice, to inspect and search all Company property for the purpose of determining whether this policy or any other policy of the Company has been violated, or when an inspection and investigation is necessary for purposes of promoting safety in the workplace or compliance with state and federal laws. These inspections may be conducted during or outside of business hours and in the presence or absence of the affected employee.

Whether information is entered or sent during or outside of working time, employees have no right of privacy as to any information or file maintained in or on Company property or transmitted or stored through Company computer systems, voice mail, e-mail or other technical resources. If, during the course of your employment, you perform or transmit work on Company computer systems or other technical resources, your work may be subject to the investigation, search and review of others in accordance with this policy. In addition, any electronically stored communications that you either send to or receive from others may be retrieved and reviewed in the discretion of the Company.

Employees may access only electronic files or programs that they have permission to access. Unauthorized copying or use of computer software exposes both the Company and the individual employee to substantial penalties. Therefore, employees may not load personal software onto the Company's computer system and may not copy software from the Company for personal or other non-approved use. All employees must contact the company IT contact to install any software on the Company's computer system.

Unauthorized review, duplication, dissemination, removal, installation, damage or alteration of files, passwords, computer systems or programs, or other property of the Company, or improper use of information obtained by unauthorized means, will not be tolerated.

Messages stored and/or transmitted by voice mail or e-mail must not contain content that violates Company policy, including but not limited to sexual comments or images, racial slurs, gender-specific comments or any comments or images that would offend someone on the basis of his or her age, sexual orientation, religious or political beliefs, national origin, disability or other protected class.

This policy is not intended to interfere with, restrain, or prevent employee communications regarding wages, hours, or other terms and conditions of employment or to otherwise interfere with employees' rights under the National Labor Relations Act. Employees have the right to

engage in or refrain from activities protected by the National Labor Relations Act.

Unacceptable Use of the Internet

In addition to the requirements stated above, use of the Internet must not disrupt the operation of the Company network or the networks of other users, and must not interfere with the productivity of any employee. Employees are not permitted to copy, transfer, rename, add or delete information or programs belonging to other users unless given express permission to do so by the owner of such information or programs.

Employees should be aware that the Company's policies related to discrimination and harassment apply to use of the Internet. As such, any conduct on the Internet that would violate the Company's discrimination or harassment policies in-person, is also prohibited on the Internet. As such, no messages with derogatory or inflammatory remarks about an individual or group's race, color, religion, sex, pregnancy and childbirth and related medical conditions including lactation, sexual orientation, gender identity or expression, national origin, age, disability, genetic information, marital status, veteran or military status, or any other protected classification under federal, state, or local law (the Protected Categories) may be transmitted.

Gaming, gambling, pornography of any sort, or any illegal behavior will not be permitted on any company devices or while using the Company network.

Employee Responsibilities

Employees will be assigned a Company E-mail address as needed, at the Company's discretion, and an assigned mail password when granted access to the Internet or the Company's electronic mail system. Employees may change these passwords from time to time; however, all passwords must be made known to the Company. Company representatives must be able to access all Company computer equipment, electronic mail and Internet accounts.

Employees with Company e-mail addresses should check their incoming mail at least daily during the work week, as important messages may be in your inbox.

Each employee is responsible for the content of all text, audio or images that they place or send over the Internet. All messages communicated on the Internet should have your name attached. No messages may be transmitted under an assumed name. Employees or other users may not attempt to obscure the origin of any message. Employees who wish to express personal opinions on the Internet are encouraged to obtain their own usernames on other Internet systems.

To prevent computer viruses from being transmitted through the system, employees are not authorized to download any software onto their computer or any drive in that computer. Employees interested in obtaining software from the Internet should contact the Company IT contact.

Employees should use caution when opening e-mails and clicking on links. Often cyber-attacks occur by clicking on a link or file attachment that is disguised as something else. Do not

open any email that looks suspicious. If you are unsure of the origin or if there are links or files that look suspicious, DO NOT open it. If you are unsure if something is legitimate, forward to Service@ArcherVA.com for assistance (our contracted IT company).

If you feel you have been hacked, **IMMEDIATELY** notify office staff for further investigation and to minimize damage.

If your device is lost or stolen, please contact the Office as soon as possible.

Devices and System Security

All devices provided by the Company and the data stored on them are and remain at all times the property of the Company. As such, all messages created, sent or retrieved over the Internet or the Company's electronic mail system are the property of the Company, and employees should have no expectation of privacy regarding such messages. The Company reserves the right to retrieve and read any message composed, sent or received on the Company's computer equipment and electronic mail system. Employees should be aware that, even when a message is deleted or erased, it is still possible to recreate the message; therefore, ultimate privacy of a message cannot be ensured to anyone. Accordingly, such Internet and electronic mail messages are not private. Furthermore, all communications, including text and images, can be disclosed to law enforcement or other third parties without prior consent of, or notice to, the sender or the receiver.

Data Usage Fees

Using Company mobile devices while traveling abroad or using the Internet excessively while not connected to Wi-Fi can cause unexpected data and usage fees. Such fees may only be incurred for work-related purposes. If determined that any additional costs are not work-related, you may be expected to reimburse the Company for costs incurred. Should you need to take a phone out of the country, you must notify the office for travel instructions.

Violations

Violations of any guidelines listed above may result in disciplinary action up to and including termination. In addition, the Company may advise appropriate legal officials of any illegal violations.

EQUAL EMPLOYMENT OPPORTUNITY; ACCOMMODATION AND ANTI-HARASSMENT POLICY

Equal Employment Opportunity Statement

We are committed to the principles of equal employment. We are committed to complying with all federal, state, and local laws providing equal employment opportunities, and all other employment laws and regulations. It is our intent to maintain a work environment that is free of harassment, discrimination, or retaliation because of age (40 and older), race (including traits historically associated with race, which includes hair texture, hair type, and protective hairstyles such as braids, locks, and twists), color, national origin, ancestry, religion, sex, sexual orientation (including transgender status, gender identity or expression), pregnancy (including childbirth, lactation, and related medical conditions), physical or mental disability, genetic information (including testing and characteristics), military status (including status as a uniformed servicemember, a veteran, or dependent of a servicemember), or any other status protected by federal, state, or local laws. The Company is dedicated to the fulfillment of this policy in regard to all aspects of employment, including but not limited to recruiting, hiring, placement, transfer, training, promotion, rates of pay, and other compensation, termination, and all other terms, conditions, and privileges of employment.

The Company will conduct a prompt and thorough investigation of all allegations of discrimination, harassment, or retaliation, or any violation of the Equal Employment Opportunity Policy in a confidential manner. The Company will take appropriate corrective action, if and where warranted. The Company prohibits retaliation against employees who provide information about, complain about, or assist in the investigation of any complaint of discrimination or violation of the Equal Employment Opportunity Policy.

We are all responsible for upholding this policy. You may discuss questions regarding equal employment opportunity with your supervisor another management official or the HR Department.

Disability and Pregnancy-Related Accommodation

We comply with the Americans with Disabilities Act (ADA), the Pregnancy Discrimination Act, and all applicable state and local fair employment practices laws and are committed to providing equal employment opportunities to qualified individuals with disabilities, and individuals with known limitations related to pregnancy, childbirth, lactation, and related medical conditions. Consistent with this commitment, the Company will provide reasonable accommodation to otherwise qualified individuals and those with limitations related to pregnancy, childbirth and related medical conditions where appropriate to allow the individual to perform the essential functions of the job, unless doing so would create an undue hardship on the business.

If you require an accommodation based on this policy or otherwise, it is your responsibility to notify your supervisor another management official or the HR Department. You may be asked to include relevant information such as:

- A description of the proposed accommodation.
- The reason you need an accommodation.

- How the accommodation will help you perform the essential functions of your job.

After receiving your request, the Company will engage in an interactive dialogue with you to determine the precise limitations of your disability and explore potential reasonable accommodations that could overcome those limitations. Where appropriate, we may need your permission to obtain additional information from your medical provider. All medical information received by the Company in connection with a request for accommodation will be treated as confidential.

The Company encourages you to suggest specific reasonable accommodations that you believe would allow you to perform your job. However, the Company is not required to make the specific accommodation requested by you and may provide an alternative accommodation, to the extent any reasonable accommodation can be made without imposing an undue hardship on the Company.

If leave is provided as a reasonable accommodation, such leave may run concurrently with leave under the federal Family and Medical Leave Act and/or any other leave where permitted by state and federal law.

The Company will not discriminate or retaliate against employees for requesting an accommodation under this policy.

Religious Accommodation

We are dedicated to treating our employees equally and with respect and recognizes the diversity of their religious beliefs. All employees may request an accommodation when their religious beliefs cause a deviation from the Company dress code or the individual's schedule, basic job duties, or other aspects of employment. The Company will consider the request, but reserves the right to offer its own accommodation to the extent permitted by law. Some, but not all, of the factors that will be considered are cost, the effect that an accommodation will have on current established policies, and the burden on operations — including other employees — when determining a reasonable accommodation.

If you require a religious accommodation, speak with your supervisor, another management official or the HR Department.

The Company will not discriminate or retaliate against employees for requesting an accommodation under this policy.

Policy Against Workplace Harassment

The Company has a strict policy against all types of workplace harassment, including sexual harassment and other forms of workplace harassment based upon an individual's age (40 and older), race (including traits historically associated with race, which includes hair texture, hair type, and protective hairstyles such as braids, locks, and twists), color, national origin, ancestry, religion, sex, sexual orientation (including transgender status, gender identity, or expression), pregnancy (including childbirth, lactation, and related medical conditions), physical or mental disability, genetic information (including testing and characteristics), military status (including status as a uniformed servicemember, a veteran, or dependent of a servicemember), or any other status protected by federal, state, or local

laws. All forms of harassment of, or by, employees, vendors, visitors, customers, and clients are strictly prohibited and will not be tolerated.

Sexual Harassment

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly as a term or condition of an individual's employment; (2) submission to, or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

While it is not possible to identify every act that constitutes or may constitute sexual harassment, the following are some examples of sexual harassment:

- Unwelcome requests for sexual favors;
- Lewd or derogatory comments or jokes;
- Comments regarding sexual behavior or the body of another;
- Sexual innuendo and other vocal activity such as catcalls or whistles;
- Obscene letters, notes, emails, invitations, photographs, cartoons, articles, or other written or pictorial materials of a sexual nature;
- Repeated requests for dates after being informed that interest is unwelcome;
- Retaliating against another for refusing a sexual advance or reporting an incident of possible sexual harassment to the Company or any government agency;
- Offering or providing favors or employment benefits such as promotions, favorable evaluations, favorable assigned duties or shifts, etc., in exchange for sexual favors;
- Any unwanted physical touching or assaults or blocking or impeding movements; and
- The spreading or participation in dissemination of gossip or rumors of a sexual nature related to co-workers.

Other Harassment

Other workplace harassment is verbal or physical conduct that insults or shows hostility or aversion toward an individual because of the individual's age (40 and older), race (including traits historically associated with race, which includes hair texture, hair type, and protective hairstyles such as braids, locks, and twists), color, national origin, ancestry, religion, sex, sexual orientation (including transgender status, gender identity, or expression), pregnancy (including childbirth, lactation, and related medical conditions), physical or mental disability, genetic information (including testing and characteristics), military status (including status as a uniformed servicemember, a veteran, or dependent of a servicemember), or any other status protected by federal, state, or local laws.

Again, while it is not possible to list all the circumstances that may constitute other forms of workplace harassment, the following are some examples of conduct that may constitute workplace harassment:

- The use of disparaging or abusive words or phrases, slurs, negative stereotyping, or threatening, intimidating, or hostile acts that relate to the above protected categories;
- Written or graphic material that insults, stereotypes, or shows aversion or hostility toward an individual or group because of one of the above protected categories and that is placed on

walls, bulletin boards, email, voicemail, or elsewhere on our premises, or circulated in the workplace; and

- A display of symbols, slogans, or items that are associated with hate or intolerance toward any select group.

Reporting Discrimination and Harassment

If you feel that you have witnessed or have been subjected to any form of discrimination, or harassment, immediately notify your supervisor, another management official or the HR Department.

The Company prohibits retaliation against employees who, based on a reasonable belief, provide information about, complain, or assist in the investigation of any complaint of harassment or discrimination. Report any instances of such retaliation to your supervisor, another management official or the HR Department.

We will promptly and thoroughly investigate any claim and take appropriate action where we find a claim has merit. To the extent possible, we will retain the confidentiality of those who report suspected or alleged violations of the harassment policy.

Discipline for violation of this policy may include, but is not limited to, reprimand, suspension, demotion, transfer, and discharge. If the Company determines that harassment or discrimination occurred, corrective action will be taken to effectively end the harassment. As necessary, the Company may monitor any incident of harassment or discrimination to assure the inappropriate behavior has stopped. In all cases, the Company will follow up as necessary to ensure that no individual is retaliated against for making a complaint or cooperating with an investigation.

Whistleblower Protections

The Company is committed to compliance with all applicable whistleblower protection laws. As such, in accordance with Virginia law, the Company will not retaliate against any employees who: report in good faith a violation of any federal or state law or regulation to a supervisor or to any governmental body or law enforcement official; are requested by a governmental body or law enforcement official to participate in an investigation, hearing, or inquiry; refuse to engage in a criminal act that would subject the employee to criminal liability; refuse an employer's order to perform an action that violates any federal or state law or regulation when the employee informs the employer that the order is being refused for that reason; or provide information to or testify before any governmental body or law enforcement official conducting an investigation, hearing, or inquiry into any alleged violation by the employer of federal or state law or regulation.

LEAVE POLICIES

Paid Time Off Policy

Paid Time Off (PTO). The Company recognizes the importance of time off for rest, relaxation, and other familial or personal obligations. Therefore, employees may use Paid Time Off (PTO) for any purpose including vacation, illness and personal appointments.

The amount of PTO available is based upon an employee's continuous length of service with the Company or as otherwise set forth below.

The positions listed below are eligible for PTO subject to the requirements of this policy.

Full-Time Non-Temporary Field Employees. Full-time non-temporary field-based employees who have been continuously employed by the Company for six (6) months to one (1) year as of January 1 of the applicable calendar year will receive forty (40) hours of PTO on January 1. Such employees who have been continuously employed by the Company for over one (1) year as of January 1 of the applicable calendar year will receive eighty (80) hours of PTO as of January 1.

Full-Time Office Employees. Full-time office employees are provided with PTO in an amount as determined at the time of hire. PTO for office employees is provided January 1 of each year.

PTO Requests and Conditions

- Employees must request PTO at least two weeks in advance, unless the absence is unforeseeable.
- For unscheduled or unexpected absences, you must contact your supervisor to request the use of PTO not later than your regular start time. In cases where PTO is used for illness, the Company may request appropriate medical certification from your health care provider to confirm the need for leave.
- Approved leaves of absence are not considered a break in continuous service and are included in determining length of continuous employment for purpose of determining the PTO amounts.
- Employees should strive to use all their PTO during the calendar year in which it is earned. Earned but unused PTO will not carry over from year-to-year.
- Employees who wish to receive pay in lieu of using earned, unused vacation may request to receive pay for up to one (1) week of PTO prior to June 30 of an applicable calendar year. After June 30 of the applicable calendar year, employees may request to cash out any remaining earned, unused PTO.

- Earned but unused PTO will not be paid out to employees upon termination of employment.
- To the extent applicable, if a paid observed holiday falls or is observed during your PTO, you will be paid for the holiday and will not be required to use PTO for that day.
- Employees must use any earned, unused PTO during all state and federal family medical leaves to the extent permitted by applicable law.
- PTO pay will be paid at an employee's regular straight-time hourly rate of pay or regular base salary for the approved PTO period. PTO days are not considered hours worked for purposes of calculating overtime.
- PTO must be taken in minimum four-hour increments and a maximum of two consecutive weeks.

Military Leave

This Military Leave Policy summarizes the Company's rules and regulations regarding military leave under the federal Uniformed Services Employment and Reemployment Rights Act of 1994 (USERRA), and applicable Virginia state law, and provides employees with information about their rights and compliance obligations.

Eligibility for Leave. This policy applies to all employees who are members of, or enter, the Uniformed Services of the United States, including the National Guard and the Commissioned Corps of the Public Health Service, any state's military forces, or the reserve components of these services, and the civil air patrol. Eligible employees may be entitled to unpaid time off from work for military service, which includes participating in active or inactive duty, training, preparing for service, traveling to the service location, and completing examinations to determine fitness for duty.

Employees who are members of the civil air patrol are entitled to up to ten days of unpaid time off from work to train for emergency missions, and up to thirty days of unpaid time off to respond to an emergency mission.

Notice. An employee requesting a military leave of absence must provide written or verbal notice to the Human Resources Department. The employee must provide notice as far in advance as is reasonable under the circumstances, but never less than thirty days in advance of the leave, unless such notice is not feasible or reasonable. An employee requesting civil air patrol leave must also provide (1) certification that the employee was authorized by the U.S. Air Force, the governor, a department, division, agency, or political subdivision of the state to respond to or train for an emergency mission, and (2) verification from the civil air patrol of the emergency need for the employee's volunteer service.

When an employee requests a military service leave, the employee is not required to state whether the employee intends to return to the Company upon completing service.

Benefits.

- (a) Healthcare Benefits. An eligible employee is entitled to continued health insurance benefits for the lesser of twenty-four months or the duration of the military leave. The Company shall pay the employer contribution amount for the first thirty days of leave. On the thirty first day, the Company shall offer continuation of coverage under the Consolidated Omnibus Budget Reconciliation Act of 1986 (COBRA) in accordance with applicable law.
- (b) Retirement Benefits. Upon reemployment, the employee's retirement benefits will be treated as if the employee had worked throughout the military service leave, in accordance with applicable law and plan documents.

Paid Time Off. All military and civil air patrol service leave shall be unpaid. If the employee has paid time off available, the employee may use paid time off during the military and civil air patrol service leave, but is not required to do so.

Reemployment. An employee returning from a military or civil air patrol service leave of absence is eligible for reemployment in accordance with the following guidelines and applicable law.

- (a) Employee Reporting Period. Except as provided under this Policy and applicable law, an employee who takes a military leave of absence for less than five years, or a civil air patrol leave will be eligible for reemployment. To maintain reemployment rights, the employee must report for reemployment within the following time periods:
 - (i) *Military Service Leave of Thirty Days or Less and Civil Air Patrol Leave.* The employee must report to work on the first regularly scheduled workday after the employee's service is complete, allowing sufficient time for return travel plus an additional eight hours. If it is impossible or unreasonable for the employee to report within this time period through no fault of their own, the employee must apply as soon as possible.
 - (ii) *Military Service Leave of Thirty-One to 180 Days.* The employee must submit a written application for reemployment within fourteen days following completion of their military service, allowing sufficient time for return travel plus an additional eight hours. If it is impossible or unreasonable for the employee to report within this time period through no fault of their own, the employee must apply as soon as possible.
 - (iii) *Military Service Leave of More than 180 Days.* The employee must submit a written application for reemployment within ninety days following completion of military service.

If the employee suffers a service-connected injury or illness, the Company will extend the applicable deadline for up to two additional years while the employee is hospitalized or convalescing.

- (b) Employee Position. When an employee returns from military or civil air patrol service, the employee will be entitled to a position as determined by the following guidelines and applicable law.
 - (i) *Military Service of Ninety Days or Less.* The Company will place any employee returning from a military service leave of 90 days or less into the position the employee would have

had if their employment had not been interrupted, so long as the employee is qualified for the position.

- (ii) *Military Service of More Than Ninety Days.* If an employee returns from a military service leave lasting ninety-one days or more, the Company will place them in the position the employee would have had if their employment had not been interrupted, or a position of like seniority, status, and pay, as long as the employee is qualified for the position.
- (iii) *Civil Air Patrol Leave.* An eligible employee is entitled to return to their employment without loss of seniority, accrued leave, benefits, or efficiency rating.

If an employee returns from leave but is not qualified for a given position, the Company will make reasonable efforts to help the employee become qualified. Such efforts may include Company-provided training or other actions that do not cause an undue hardship on the Company. In order to return to a position with the Company, the employee must be able to perform the essential functions of that position.

- (c) Exceptions. Employees who do not receive an honorable discharge are not eligible for reemployment. Employees who are with the Company for a brief, nonrecurrent period of time, and do not have a reasonable expectation that their employment will continue for a significant period of time are not entitled to reemployment or any related benefits.

For Cause Termination. When an employee returns from military service, the Company may terminate the employee in accordance with the following guidelines and applicable law.

- (a) Military Service Leave for Thirty-One to 180 Days. If the employee's leave lasted for thirty-one to 180 days, the Company will only terminate the employee for cause during the first 180 days of reemployment.
- (b) Military Service Leave of 181 Days or More. If the employee's leave lasted for 181 days or more, the Company will only terminate the employee for cause during the first year of reemployment.

The Company may terminate an employee "for cause" due to an employee's misconduct, or any other legitimate, nondiscriminatory reason. Nothing in this section prevents the Company from disciplining an employee whose conduct is in violation of Company policy.

Discrimination and Retaliation Prohibited. The Company prohibits discrimination against an employee on the basis of requesting or taking a military service leave. The Company will not deny employment, promotion, or any benefit of employment to a person on the basis of a past, present, or future service obligation. Additionally, the Company prohibits retaliation against individuals either because of an action they take to enforce or exercise any rights under USERRA or Virginia state law, or for assisting in an investigation under such laws. Violation of this Section is a serious violation of Company policy. Anyone engaging in such conduct may be subject to discipline, up to and including termination of employment.

Questions / Complaints. If you are unclear on any provisions of this Policy, or you experience or observe any conduct that may be contrary to this Policy, please contact your supervisor, another

management official or the HR Department.

Jury Duty Leave

The Company encourages employees to fulfill their civic duties. To that end, the Company will provide employees time off to serve on a jury or grand jury as required by law.

Leave under this policy will be unpaid for non-exempt employees. Exempt employees who work any portion of a workweek in which they also perform jury duty will receive their full salary for that workweek. Exempt employees will not be paid for a week in which their jury service causes them to be absent for the complete workweek.

To receive the pay described above, employees must submit proof of their jury service and jury duty compensation to the HR Department upon their return to work.

Employees who receive a summons to report for jury duty must notify the HR Department immediately. Employees are considered to be on a leave of absence during their jury duty service and entitled to continue to participate in insurance and other benefits as if they were working. While serving on jury duty, employees will be expected to periodically contact their supervisors to keep them apprised of their status. Employees are also expected to report to work each day or portion of a day they are not required to perform jury duty, except where prohibited by law.

The Company will not require night-shift or early-shift employees to work while serving jury duty.

The Company prohibits retaliation against employees or applicants due to their requests for jury duty leave or their service as jurors in state or federal courts.

Employees having questions about any provisions of this policy should contact your supervisor, another management official or the HR Department.

Witness and Victims of Crime Leave

Crime Victim Leave: Leave entitlement. The Company will provide leave to an employee to attend all criminal proceedings related to a crime if that employee is a victim of the crime. An employee is eligible for leave as a crime victim if he or she has suffered physical, psychological, or economic harm as a direct result of the commission of a felony, assault and battery, stalking, sexual or attempted sexual battery or maiming or driving while intoxicated. An employee may also take crime victim leave if he or she is the spouse or child of the victim of a crime, the parent or legal guardian of a minor child who is the victim of a crime, or the spouse, parent, sibling, or legal guardian of a homicide victim or a person who is legally or mentally incapacitated and who is the victim of a crime.

The Company may limit the amount of crime victim leave taken by the employee if the employee's use of such leave creates an undue hardship on the Company's business.

Witness Leave: Leave entitlement. The Company will provide employees with leave to appear in court or any other judicial proceeding as a witness pursuant to a valid subpoena or other court order. An

employee is not eligible for witness leave if he or she is a defendant in a criminal case.

Crime Victim Leave: Leave substitution and pay. Crime victim leave will be unpaid. However, employees may elect to substitute available paid time off for purposes of an absence under this policy.

Witness Leave: Leave substitution and pay for non-exempt employees. Witness leave will be unpaid for non-exempt employees. However, employees may elect to substitute available paid time off for purposes of an absence under this policy.

Witness Leave: Exempt employees. Exempt employees who work any portion of a workweek in which they also appear as a witness will receive their full salary for that workweek. The Company will not pay exempt employees if their service as a witness causes them to be absent for complete weeks.

Witness Leave: Witness fees. If employees receive witness fees for their service, the Company reserves the right to subtract the fees from employees' compensation unless prohibited by law.

Employee Notice Requirements. Employees should provide reasonable advance notice of the need for leave under this policy.

Partial Days. Employees are expected to report to work each day or portion of a day on which they are not on leave under this policy.

Employee Documentation Requirements. Employees may be required to provide documentation supporting the need for leave under this policy. This may include a copy of (a) the victim's rights form provided to the employee by the applicable law enforcement agency pursuant to Va. Code Ann. § 19.2-11.01(A), if applicable, (b) a copy of the notice that the employee receives for each scheduled criminal proceeding, or (c) a copy of the notice or subpoena and/or supporting documentation certifying the dates and times of their service as a witness or their need for crime victim leave within a reasonable time.

Consequences of Failure to Provide Notice and/or Documentation. Failure to provide required documentation may result in the denial of a request for leave under this policy.

Non-Discrimination and Non-Retaliation Statement. The Company prohibits retaliation against an employee for requesting, obtaining, or using leave under this policy. The Company prohibits interfering with or otherwise dissuading or attempting to dissuade an employee from performing his or her witness duties.

Organ or Bone Marrow Donor Leave

Leave Entitlement. The Company will grant eligible employees the following unpaid leaves of absence to serve as a bone marrow or organ donor. The available leave may be taken in one or more periods:

- (a) A leave of absence of up to 30 business days in any 12-month period for the purpose of donating the employee's bone marrow to another person
- (b) A leave of absence of up to 60 business days in any 12-month period for the purpose of the employee donating the employee's organ to another person

Any leave taken under this policy will not run concurrently with leave taken under the federal Family and Medical Leave Act.

Eligible Employees. Employees who have been employed by the Company for at least 1,250 hours during the twelve-month period immediately prior to the date leave is requested are eligible for leave.

Use of PTO. If an employee has PTO available, the employee is required to first use any available PTO for a bone marrow donation or organ donation leave.

Employee Notice and Verification Requirements. Employees requesting a leave of absence to serve as an organ or bone marrow donor must provide (1) reasonable notice of the planned leave; and (2) a written physician verification stating that the employee is going to be an organ or bone marrow donor, and that there is a medical need for the donation. The required notice and written verification from the physician must be provided to the HR Department.

Benefits During Leave Period. Any leave taken under this policy will not constitute a break in service for purposes of the employee's right to salary adjustments, PTO, seniority, or other employee benefits. During the leave period, the Company will pay employee any commissions that become due for work the employee performed prior to taking leave.

The Company will maintain the employee's coverage under its group health plan for the duration of leave in the same manner that coverage would have been provided if the employee had remained continuously employed during the leave.

Restoration of Position. Upon expiration of a leave of absence authorized by this policy, the Company will restore the employee to the position held by the employee when the leave began, or to a position with equivalent seniority status, employee benefits, pay, and other terms and conditions of employment. The Company may decline to restore an employee because of reasons unrelated to the exercise of rights under this policy by the employee.

Nonretaliation Statement. The Company prohibits retaliation against an employee for requesting or obtaining leave under the policy.

Family and Medical Leave Act

This policy summarizes the federal Family and Medical Leave Act ("FMLA"). A summary of rights under the FMLA prepared by the United States Department of Labor (DOL Form WH 1420) can be found at <https://www.dol.gov/sites/dolgov/files/WHD/legacy/files/fmlaen.pdf>.

Eligible employees may request a leave of absence under the FMLA for the purposes, and subject to the terms and conditions, described below. Where state or local leave laws offer greater protections or benefits to employees, the protections and benefits provided by such laws shall govern. To the extent permitted by law, such leaves shall run concurrently with an employee's federal leave rights under the FMLA.

Eligibility. Eligible employees are those whom the Company has employed for at least twelve months (not necessarily consecutive), have worked at least 1,250 hours during the twelve months immediately prior to the requested leave of absence, and are employed at a worksite where fifty or more employees of the Company work within seventy-five miles.

Employee Request for and Notice of Leave. Employees must provide sufficient information so the Company can determine whether the request for time off qualifies as FMLA leave, as well as the timing and duration of the leave. When the need for family and medical leave is foreseeable, such as due to a planned medical procedure, an employee must notify the Company of the need for the leave at least thirty days before the leave begins. If thirty days advance notice is not practicable because the employee just learned of the need for leave or a change in circumstances or a medical emergency has occurred, then the employee must request the leave as soon as practicable (generally the same day or the day following the day the employee learned of the need for leave).

When the need for leave arises suddenly, the employee must notify his or her Manager or the Human Resources Department as soon as possible—either before leaving work or not later than the start of the employee's next regular workday. The employee must follow the Company's standard call-in procedures for unscheduled absences. Failure to comply with the request and notice procedures may delay the start of a leave.

Purposes. A family and medical leave may be taken by an eligible employee for the following reasons:

The birth of an employee's son or daughter or the placement of a son or daughter with the employee for foster care or adoption, so long as the leave is completed within twelve months of the birth or placement of the son or daughter;

To care for the employee's spouse, son, daughter or parent with a "**serious health condition**;"

Due to the "**serious health condition**" of the employee that renders the employee unable to work or in need of medical treatment;

Because of any **qualifying exigency** arising out of the fact that the employee's spouse, son, daughter or parent is a **military member** who is on **covered active duty** or has been notified of an impending call or order to **covered active duty** in the Armed Forces of the United States; or

To care for a **covered service member** (who is the employee's spouse, son, daughter, parent or next of kin) with a **serious illness or injury** ("military caregiver leave").

Definitions. The terms used in this policy, including the bolded terms above, are defined in the FMLA, as amended, and applicable regulations.

A “**serious health condition**” includes an illness, injury, impairment, or physical or mental condition that involves either an overnight stay in a medical care facility, or continuing treatment by a health care provider for a condition that either prevents the employee from performing the functions of the employee’s job, or prevents qualified family members from participating in school or other daily activities. Subject to certain conditions, the continuing treatment requirement may be met by a period of incapacity of more than three consecutive calendar days combined with at least two visits to a health care provider or one visit and a regimen of continuing treatment, or incapacity due to pregnancy, or incapacity due to chronic condition. Other conditions may meet the definition of continuing treatment.

A “**covered service member**” means (A) a current member of the Armed Forces (including National Guard or Reserves) of the United States who is undergoing medical treatment, recuperation or therapy, is otherwise in outpatient status, or is otherwise on the temporary disability retired list, for a serious injury or illness, or (B) a covered Veteran who is undergoing medical treatment, recuperation or therapy, for a serious injury or illness.

“**Covered active duty**” means (A) in the case of a member of the Regular Armed Forces of the United States, duty during the deployment of the member with the Armed Forces to a foreign country; and (B) in the case of a member of the Reserve components of the Armed Forces of the United States, duty during the deployment of the member with the Armed Forces to a foreign country under a federal call or order to active duty in support of a contingency operation, as provided by law.

A “**military member**” for purposes of qualifying exigency leave is an employee’s spouse, son, daughter, or parent serving in the Regular Armed Forces, the National Guard or the Reserves.

A “**serious injury or illness**” means **in the case of a member of the Armed Forces of the United States** (including a member of the National Guard or Reserves), an injury or illness incurred by the member in the line of duty while on active duty in the United States Armed Forces (or that existed before the beginning of the service member’s active duty and was aggravated by service in the line of duty on active duty in the Armed Forces) and that may render the member medically unfit to perform the duties of the member’s office, grade, rank or rating.

A “**serious injury or illness**” means **in the case of a covered veteran**, a qualifying injury or illness that was incurred by the service member in the line of duty on active duty in the Armed Forces, or that existed before the beginning of the service member’s active duty and was aggravated by service in line of duty on active duty in the Armed Forces, and that manifested itself before or after the service member became a veteran, and is either: (1) a continuation of a serious injury or illness that was incurred or aggravated when the covered veteran was a member of the Armed Forces and rendered the service member unable to perform the duties of the service member’s office, grade, rank or rating; or (2) a physical or mental condition for which the veteran has received a U.S. Department of Veterans Affairs Service-Related Disability Rating of fifty percent or greater, and the need for military caregiver leave is related to that condition; or (3) a physical or mental condition that substantially

impairs the veteran's ability to secure or follow a substantially gainful occupation because of a disability or disabilities related to military service, or would do so absent treatment; or (4) an injury, including a psychological injury, on the basis of which the veteran is enrolled in the Department of Veteran Affairs Program of Comprehensive Assistance for Family Caregivers.

A “**qualifying exigency**” includes the need for an employee to take time off work to address issues related to short-notice deployment, make arrangements for alternative child care, attend certain school activities, handle certain financial or legal arrangements, attend certain counseling sessions, attend military ceremonies or informational briefings, to spend short periods of time for rest and recuperation during the period of deployment, or participate in certain post-deployment activities or parental care leave.

The “**designated twelve-month period**” is the rolling twelve-month period measured backward from the date an employee uses any family and medical leave. During this period, eligible employee may use up to twelve workweeks of family and medical leave.

The “**single twelve-month period**” is the twelve-month period that begins on the first date the employee uses any military caregiver leave. During this period, eligible employees may use up to twenty-six workweeks of military caregiver leave. The twenty-six weeks is applied per covered service member, per injury. This means that an employee may not take twenty-six weeks of leave in different twelve-month periods to care for the same service member suffering from the same injury. Rather, a subsequent leave must concern the care of a different service member or the same service member with a different injury.

A “**son or daughter**” is a biological, adopted or foster child, a stepchild, a legal ward, or a child of a person standing in loco parentis, who is (A) under eighteen years of age, or (B) eighteen years of age or older and incapable of self-care because of a mental or physical disability. Either day-to-day care or financial support may establish an in loco parentis relationship where the employee intends to assume responsibilities of a parent with regard to a child.

A “**spouse**” is the person to whom an individual is married as defined or recognized under the law of the state in which the parties married. If the parties married outside of any state, then the marriage must be valid where it occurred and it must be a marriage into which the parties lawfully could have entered in at least one state. The definition of spouse does not include registered domestic partners.

“**Covered Veteran**” means a person who was a member of the Armed Forces of the United States (including a member of the National Guard or Reserves) and who was discharged or released from such service under conditions other than dishonorable at any time during the five-year period prior to the first date the eligible employee takes FMLA leave to care for the covered veteran.

Duration. Family and medical leave may be taken for up to twelve workweeks during the **designated twelve-month period** (as defined above) for the birth of an employee's son or daughter; the placement of a son or daughter with the employee for foster care or adoption; to care for an employee's spouse, son, daughter, or parent with a serious health condition; due to the employee's serious health condition; or because of a qualifying exigency. Military caregiver leave may be taken

for up to twenty-six workweeks in a **single twelve-month period** (as defined above). During the **single twelve-month period**, an eligible employee shall be entitled to a combined total of twenty-six workweeks of leave for any reason specified above. In other words, any family and medical leave taken during the **single twelve-month period** for the birth of an employee's son or daughter; the placement of a son or daughter with the employee for foster care or adoption; to care for an employee's spouse, son, daughter, or parent with a serious health condition; due to the employee's serious health condition; or because of a qualifying exigency (up to twelve weeks) will be counted towards the total twenty-six week entitlement permitted for leave to care for a covered service member with a serious illness or injury during that **single twelve-month period**. All time off that qualifies as family and medical leave will be counted against the employee's federal and, if applicable, state family and medical leave entitlement to the fullest extent permitted by law.

Use of Leave. Family and medical leave should be used as needed, but must be used in minimum increments of at least one hour. Intermittent or reduced-schedule leave is available, if medically necessary. Employees must make a reasonable effort to schedule planned medical treatments so as not to unduly disrupt business operations. For planned absences that are intermittent or on a reduced schedule, the Company may require the employee to temporarily transfer to an alternative position for which the employee is qualified, with equivalent pay and benefits, that better accommodates the recurring periods of leave than the employee's regular position. Leave due to qualifying exigencies may also be taken on an intermittent basis.

Medical Certification. When leave is requested for the employee's or a family member's serious health condition, the employee must submit appropriate medical certification from the health care provider of the patient. The Human Resources Department will provide the appropriate certification form. A complete and sufficient certification must be provided as soon as is reasonably practical, and not later than the date leave begins or within fifteen days of the Company's request, whichever is later.

When the leave is requested because of the employee's own serious health condition, the certification must include: (1) the date the serious health condition commenced, (2) the probable duration of the serious health condition, (3) information sufficient to establish that the employee has a serious health condition, and (4) information sufficient to establish the employee cannot perform the essential functions of the employee's job as well as the nature of any other work restrictions and the likely duration of such inability. The employee must provide the required medical certification to the Company in a timely manner to avoid a delay or denial of leave. Employees should obtain appropriate forms from the Human Resources Department.

The Genetic Information Nondiscrimination Act of 2008 ("GINA") prohibits covered employers from requesting or requiring genetic information of an individual or family member of the individual, except as specifically allowed by this law. To ensure compliance with this law, the Company asks that employees not provide any genetic information when responding to a request for medical information for purposes of leaves of absence or otherwise. "Genetic information" as defined by GINA, includes an individual's family medical history, the results of an individual's or family member's genetic tests, the fact that an individual or an individual's family member sought or received genetic services, and genetic information of a fetus carried by an individual or an individual's family member or an embryo

lawfully held by an individual or family member receiving assistive reproductive services. If you have any questions about the information to be provided, please contact the Human Resources Department.

If the Company has reason to doubt the validity of the first medical certification, it may require at its expense that the employee get a second opinion from a healthcare provider chosen or approved by the Company, as long as that healthcare provider does not work for the Company. If the opinions of the healthcare providers for the first and second certifications differ, the Company may require the employee to obtain a certification from a third healthcare provider (approved jointly by the Company and the employee) at the Company's expense. The third certification shall be final and binding.

When leave is requested to care for a family member (either because the family member has a serious health condition or the employee requests a military caregiver leave), the certification must include: (1) information sufficient to establish that the family member has a serious health condition or serious injury or illness, and the date the condition began, (2) the probable duration of the condition, (3) information sufficient to establish the family member is in need of physical and/or psychological care, and (4) an estimate of the frequency and duration of the leave required to care for the family member.

The Company will notify the employee if the certification is incomplete or insufficient, and provide the employee seven calendar days to correct the deficiency. The Company reserves the right to contact the health care provider to seek authentication or clarification of information in the certification, as needed, and may require recertification, as appropriate and as permitted by law.

Before returning to work at the conclusion of a leave due to the employee's own serious health condition, the employee is required to provide a certification from his or her health care provider regarding the employee's fitness for duty.

Certification of Qualifying Exigency. When leave occurs due to a qualifying exigency, the employee must submit a completed Certification of Qualifying Exigency for Military Family Leave to establish the employee's eligibility for this leave. The Human Resources Department will provide the appropriate certification form. A complete and sufficient certification must be provided as soon as is reasonably practical, and within fifteen days of the Company's request.

Pay and Benefits. Family and medical leave is unpaid. However, unless prohibited by applicable law, an eligible employee must use any accrued PTO or sick leave during the otherwise unpaid portions of family and medical leave to which he or she is otherwise entitled.

Use of PTO and/or sick time will be subject to the terms and conditions of the applicable PTO and sick leave policy. Neither PTO nor sick pay will accrue during any unpaid portions of leave. Holidays that fall during any unpaid portions of leave will not be paid.

During a family and medical leave, group health benefits will be maintained for up to twelve workweeks (up to twenty-six workweeks for military caregiver leave) as if the employee were

continuously employed; however, the employee must continue to pay the employee's share of premiums for the employee and any covered dependents, if any, during the leave. If the employee fails to return to work at the conclusion of the approved leave, the Company may recover its share of the premiums paid during the leave, unless the inability to return is due to circumstances beyond the employee's control or otherwise excused. An employee on an approved family and medical leave will not lose any benefits accrued before the leave began.

Reinstatement. Employees who return to work immediately after the end of an approved family and medical leave will normally be reinstated to the same or an equivalent position, and will receive pay and benefits equivalent to those the employee received prior to the leave, as required by law. If the employee does not return to work on the first workday following the expiration of an approved family and medical leave, and has not been granted an extension of leave by the Company, the employee will be deemed to have resigned from employment. In certain circumstances, "key" employees may not be eligible for reinstatement following a family and medical leave. The Company will provide written notice to any "key" employee who is not eligible for reinstatement. "Key" employees are salaried employees who are among the highest paid ten percent of the employees employed by the Company within seventy-five miles of the facility at which the employee is employed.

Employer Responsibilities. The Company shall inform employees requesting leave whether they are eligible under the FMLA and, as applicable, state law. If they are, the Notice of Eligibility will specify any additional information required, as well as the employee's rights and responsibilities. If an employee is not eligible, the Company shall provide a reason for the ineligibility.

The Company shall also inform eligible employees if leave will be designated as FMLA-protected leave and the amount of leave that will be counted against the employee's leave entitlement. If the Company determines the leave is not protected by the FMLA, the Company shall notify the employee.

No Retaliation. The Company will not interfere with, restrain, or deny the exercise of any right provided under the FMLA or equivalent state law. The Company will also not discharge or discriminate against any person for opposing any practice made unlawful by the FMLA or for the person's involvement in any proceeding under or relating to the FMLA. If you feel that you have been discriminated or retaliated against due to your assertion of FMLA-protected rights or participation in an FMLA-related proceeding, please contact your supervisor or Human Resources Department.

Enforcement. An employee may file a complaint with the U.S. Department of Labor or may bring a private lawsuit against an employer. The FMLA does not affect any federal or state law prohibiting discrimination, or supersede any state or local law or collective bargaining agreement which provides greater family or medical leave rights.

FMLA section 109 (29 U.S.C. § 2619) requires that FMLA-covered employers post the text of the FMLA notice (WH 1420). Regulations 29 C.F.R. § 825.300(a) may require additional disclosures. For additional information please reference: 1-866-4US WAGE (1-866-487-9243) TTY 1-877-889-5627.

If you have any questions concerning the FMLA, or would like to submit a request for a family and medical leave of absence, please contact the HR Department.

