

Contractor and Temporary Worker Safety Procedure

January 2023

A. Policy

All firms contracted by IPS★ITCS because they are employers, are required by the Occupational Safety and Health Act of 1970 to provide safe and healthy employment to their employees.

IPS★ITCS as an employer is also responsible for providing a safe and healthful work environment for its employees. Contract work, especially in occupied buildings, may present situations or conditions that may adversely impact on the safety and health of our Company employees.

This Contractor and Temporary Worker Safety Program is designed to protect company and contractor employees, equipment and facilities from injury, accident, or loss. Contractors are persons not directly employed by IPS★ITCS but who provide specific labor or services.

Examples of Contractor Employers are:

1. Construction Companies
2. Utility Service or Repair Companies
3. Janitorial Services
4. Equipment Repair Personnel
5. Pest Control Services
6. Vehicle and Machinery Mechanics
7. Food Service and Vending Machine Services
8. Transportation & Shipping Services
9. Raw Product Suppliers

As a condition of doing business with IPS★ITCS, all contractors must comply with applicable local, state, federal regulatory requirements and IPS★ITCS safety procedures and policies.

B. Responsibilities

All Company personnel responsible for managing contracts will ensure that:

1. Each contractor is provided with warnings of hazards and information about our Company programs for abating these hazards.
2. Each contractor is informed of our Company's safety, health, and environmental requirements; and

3. The work is conducted in a safe and responsible manner in compliance with applicable regulations and our Company's requirements.

Our Company's Contracting Officer will ensure that the contract language requires the contractor to:

- a. Meet all applicable federal, state, and local environmental, health, and safety regulations and our Company's requirements.
- b. Provide their employees with the necessary training, medical exams, and safety equipment.
- c. Submit written comprehensive safety and health plan for the specific contract undertaken.
- d. Comply with all applicable federal, state, and local regulations and our Company's requirements, with violation being grounds for default of the contract.

Our Project Contracting Officer will:

1. Communicate the contractual, statutory, and other environmental, health and safety requirements to the contractor prior to the start of the contract.
2. Ensure that the contractor's safety and health plan is submitted with their bid package.
3. Ensure that such requirements are addressed in the Request for Solicitation and/or contract paperwork; and
4. Ensure that such requirements are observed.
5. Upon receipt of a report of a non-compliance or any condition which poses a serious or imminent danger to health or safety, issue a request for immediate corrective action from the contractor.

Our Project Compliance Officer will, prior to the start of the contract, inform the contractor of the requirement to observe all environmental, health, and safety provisions specified in the contract, provided by statutes/regulations, or otherwise required.

Our Project Compliance Officer and their representative will:

1. Ensure our HSEQT Manager is provided with a copy of the contractor's written health and safety plan for review prior to the pre-construction meeting with the contractor.
2. Ensure our HSEQT Manager is represented at all pre-construction meetings held with contractors.
3. Provide our HSEQT Manager and our Security Officer with a tentative construction schedule for contractors on-site and immediate written notification of changes.
4. Notify our Company's Management of the contractor work schedule, location, and special precautions or concerns prior to the start of the project.
5. Monitor the contractor's work performance and determine if contractor is complying with the contract health and safety plan and pertinent environmental, health, and safety regulations. Any questions regarding compliance with specific regulations should be referred to our Safety and Health Manager.
6. Ensure that all required permits are completed by the contractor and provided for review and signature of an authorized person and by our HSEQT Manager
7. Notify our HSEQT Manager immediately of construction accidents and provide our HSEQT Manager with a copy of the contractor's accident reports.
8. Notify our HSEQT Manager immediately of an OSHA complaint and/or inspection of contractor's job site.

Our HSEQT Manager will conduct a pre-solicitation project review of the contract to ensure that all appropriate health and safety regulations and requirements and pertinent work site hazard information have been incorporated, where necessary. Our HSEQT Manager will document review of the plan and will note any areas of special concerns.

The HSEQT Manager will review and monitor the contractor's adherence to its written health and safety plan and all applicable environmental, health, and safety requirements.

The contractor is responsible for meeting all contractual agreements and for providing a safe and healthy workplace for its employees.

The contractor will:

1. Provide for daily, frequent, and regular safety inspections of the work sites, materials, and equipment by competent employees.
2. Notify our Project Compliance Officer of construction accidents in a timely manner.
3. Notify our Project Compliance Officer of any non-formal OSHA complaint notifications and/or OSHA inspection(s) of the job site.
4. Identify and correct hazards
5. Provide contractor employees with requires personal protective equipment
6. Ensure Contractor Employees have the proper training for assigned tasks
7. Coordinate with our Project Compliance Officer for safety related issues
8. Maintain required insurance coverage
9. Establish and maintain an effective Safety and Health Program
10. Establish and maintain an effective Housekeeping Program
11. Program

Minimum Contractor Insurance Requirements- Contractors and Vendors are required to meet minimum Insurance Requirements according to the following schedule:

Coverage Minimum Per Occurrence Limits:

- Automobile Liability \$ _____
- General Liability \$ _____
- Products Liability \$ _____
- Completed Operations Liability \$ _____
- Workmen's Compensation \$ _____

Certificates of Insurance

Contractors must provide IPS★ITCS a Certificate of Insurance. The Certificate must list IPS★ITCS, its Divisions and Subsidiaries as a Certificate Holder with notification of cancellation or non-renewal. Without the Certificate, IPS★ITCS may have to assume the liabilities and responsibilities for the Contractor.

C. The Contractor Health and Safety Plan

When required by the contract, the contractor must develop and implement a comprehensive health and safety plan for their employees which covers all aspects of onsite construction operations and activities associated with the contract. This plan must comply with all applicable health and safety regulations and any project-specific

requirements that our Company has specified. The contractor must provide our Contracting Officer with a copy of this plan with their bid package.

Acceptance of the contractor's health and safety plan only signifies that the plan generally conforms to the requirements of the contract. It does not relieve the contractor of the responsibility for providing employees with a safe and healthful work environment. This concept must be communicated to the contractor by our Contracting Officer and also incorporated into the contract document.

D. Pre-Project Meeting

Representatives of the contractor shall meet with our Contracting Officer, Project Compliance Officer, and Safety and Health Manager. The purpose of the meeting will be to discuss our safety requirements and for the implementation of all health and safety provisions pertinent to the work under contract.

Our HSEQT Manager will review the contractor's site-specific safety and health plan with the contractor as well as review all required SAFETY DATA SHEETS (SDS) submitted for proposed products to be used by the contractor.

Our Company is required by OSHA standards (most notably 29 CFR 1910.1200, Hazard Communication Standard) to provide information to contractors on the hazards present at the work site. This information will be made available to the contractor in the project specifications (pre-bid) as well as at the pre-construction meeting.

Our HSEQT Manager will, during the pre-construction meeting, provide the contractor with copies of our Company's written procedures such as lock-out/tag-out, confined space entry and permit process, and other safety and health requirements that apply.

E. Fire Prevention and Protection

The contractor shall prepare and carry out an effective fire protection and prevention plan, including provisions for the fire protection and suppression equipment set forth in this section. This plan shall be made part of the comprehensive safety and health plan submitted by the contractor with their bid package.

F. Housekeeping

Good housekeeping, with provision for the prompt removal and disposal of accumulations of combustible scrap and debris, shall be maintained in all areas of the job site. Self-closing metal containers shall be used for disposal of waste saturated with flammable liquids.

G. Codes and Regulations

The contractor shall comply with the requirements published in the current revisions of the National Electrical Code, National Electrical Safety Code, the National Fire Protection Association standards, and all other applicable Municipal Codes and Regulations.

H. Smoking

Smoking or other sources of ignition shall not be permitted in areas where flammable or explosive materials are stored or are present. All such areas shall be conspicuously posted: NO SMOKING OR OPEN FLAMES. There is a no smoking policy in effect within all Company facilities.

I. Fires

Fires and open flame devices shall not be left unattended unless protected with automatic temperature control and cutoff devices.

J. Cleaning and Degreasing

Gasoline and liquids with a flash point below 100 degrees Fahrenheit shall not be used for cleaning and degreasing.

K. Building Exits

All buildings, shops, and plant facilities in which employees are required to work shall have at least two well-marked and lighted exits. The two exits shall be arranged to minimize the possibility of both exits being rendered inaccessible by one fire or emergency condition.

L. Fire Extinguishers

Distinctly marked fire extinguishers rated 2A40B:C or greater shall be suitably placed as follows:

1. One for each 3,000 square feet of building area or major fraction thereof. Travel distance from any point of protected area to nearest extinguisher shall not exceed 100-feet.

2. One or more on each floor of buildings with at least one located adjacent to each stairway.

3. At least one located outside but not more than 10-feet from the door opening into any room used for storage of more than 60-gallons of flammable or combustible liquids.

4. At least one located not less than 25-feet, nor more than 75-feet from any outside flammable or combustible liquid storage area.

5. At least one within 50-feet of wherever more than 5-gallons of flammable or combustible liquids or 5 pounds of flammable gas is being used.

M. Noncompliance With Safety and Health Requirements

If during the contract, our HSEQT Manager notes any situations of non-compliance with the contractor's safety and health plan or with our Company's safety and health requirements, our HSEQT Manager will bring them to the attention of our Project Compliance Officer and our Contracting

Officer verbally (and will immediately follow-up in writing). Failure to correct the violation or continued violations shall be grounds for termination of the contract.

If after notifying the Project Compliance Officer and Contracting Officer in writing of deficiencies in any health, safety, or environmental requirements, and if our HSEQT Manager finds continued violations of those requirements, or find actions that pose an imminent danger, an immediate order to stop work will be issued. Should this occur, our HSEQT Manager will bring the matter to the immediate attention of the Project Compliance Officer and Contracting Officer. Such violations may result in the default of the contract.

Our HSEQT Manager will document all violations brought to the attention of the contractor, Project Compliance Officer, and Contracting Officer

N. Safety Training

The contractor must ensure that their employees have completed appropriate health and safety training when required by statute/regulation and our Company's requirements and provide documentation of such training when required by the contract.

Information and training are to be made available to contractors in the form of copies of written safety programs. Written programs from the Required Training list, based on hazard exposure are to be presented to contractors.

Required Training for Contractor Employees

1. General Safety Rules, including reporting of Unsafe Conditions
2. Hazard Communication, Chemical Safety, and SDS Familiarity
3. Lock-out-Tag-out
4. Electrical Safety
5. Evacuation Routes, Alarms & Procedures
6. Hot Work Program
7. Confined Space Program
8. Process Safety Management
9. Personal Protective Equipment
10. Fall Prevention

O. Medical Clearance

The contractor must ensure that their employees have appropriate medical clearance when required either by governmental regulations or by our Company's requirements. Copies of medical clearance for contractor personnel are required to be presented as specified by the contract.

The Project Compliance Officer and our HSEQT Manager shall, in conjunction with our Company's requirements, determine if additional medical requirements (i.e., Blood serum samples, immunizations) are required for contractor personnel prior to the start of work.

P. Incident Reporting

Our HSEQT Manager will participate with contractors in the investigations of incidents resulting in injury/illness and/or damage or loss of government property and near misses.

Q. Safety And Personal Protective Equipment

Unless otherwise specified, the contractor is responsible for providing all necessary safety and personal protective equipment needed by their employees. This equipment must meet appropriate OSHA and ANSI approval requirements and be in good working order.

The contractor shall ensure that their employees have received appropriate training on the use and maintenance of safety and personal protective equipment prior to its use. Failure to correctly use appropriate safety equipment is a violation of the contract and may result in default of the contract.

R. Documentation

The contractor must provide our Company with documentation of all required training, medical exams, permits, SAFETY DATA SHEETS (SDS), etc., for their employees or operations at the pre-construction meeting.

Competency Assessment

No.	Questionnaire	C/NYC
Q1		
A1		
Q2		
A2		
Q3		
A3		
Q4		
A4		
Q5		
A5		

Enclosed Attachments	
Risk Assessment	<input checked="" type="checkbox"/>
Environmental Aspect and Impact	<input checked="" type="checkbox"/>
Training and Competency	<input checked="" type="checkbox"/>
Measure and Evaluation Tools	<input checked="" type="checkbox"/>

Competency Checklist

To be filled out by Trainer and signed by Employee, Assessor and Supervisor before being returned to the HSEQT Manager for recording purposes.

Procedure	Competency	Date	Competent YES / NO	Employee Signature

(Please tick appropriate box)

This employee is competent in performing the job.

This employee has not attained the competency level.

*

* *If the employee has not attained all competency levels, the General Manager must assess the action to be taken, provide an extension of training or alternative action as listed below.*

Alternate action to be taken: _____

Signed By	Employee:		Date:	
	Trainer:		Date:	
	Assessor:		Date:	
	Regional Manager:		Date:	

Environmental Aspects and Impacts

Identified Environmental Aspects and Impacts

The following table is a summary of the likely environmental aspects and impacts that may be identified during site inspections. The significance of each impact needs to be assessed using the Risk Assessment Model.

Activity	Aspect	Impact
Purchasing & Administrative Work	Consumption of goods	Conservation of natural resources
	Consumption of energy (eg. Electrical equipment and facilities)	Release of greenhouse gases and atmospheric pollution; Consumption of natural resources; Habitat loss
	Generation of waste (eg. Paper)	Consumption of space for waste disposal; Habitat loss
Climate Control	Consumption of energy	Release of greenhouse gases and atmospheric pollution; Consumption of natural resources; Habitat loss
	Generation of noise	Disturbance to community; Habitat loss
Cleaning of – offices / vehicles	Storage, use and release of chemicals	Contamination of air, water or soil; Risk to human health
Transport (Fleet vehicles / staff travel)	Consumption of energy	Release of greenhouse gases and atmospheric pollution; Consumption of natural resources; Loss of habitat at all stages of generation; Light pollution
	Consumption of goods (eg. Oil)	Consumption of natural resources; Generation of waste; Habitat loss; Biodiversity impacts
	Generation of waste (eg. Oil)	Consumption of space for waste disposal; Potential contamination of water or soil; Habitat loss
	Exhaust emission	Release of greenhouse gases and atmospheric pollution
	Use of dangerous goods (eg. Batteries)	Potential contamination of air, water or soil; Risk to human health
	Generation of noise	Disturbance to community; Habitat degradation
Operations		

Sample only.
To be filled in

Risk Assessment



Risk Assessment // insert name here

<p>Step No: Logical sequence</p>	<p>Sequence of Basic Job Steps documented in the Procedure, Work Instruction and project plans. Break down Job into steps.</p> <p>Each step should be logical and accomplish a major task.</p>	<p>Potential Safety & Environmental Hazards/Impacts at the site of the Job</p> <p>Identify the actual and potential health and safety hazards and the environmental impacts associated with each step of the job.</p>	<p>Risk Rating</p> <p>Refer to the risk matrix or HSEQT.PRO. Risk Mgt</p>	<p>Recommended Corrective Action or Procedure</p> <p><i>Determine the corrective actions necessary to reduce the risk to as low as reasonably practical (ALARP) refer to HSEQ.PRO.Risk Mgt. The risk must be reduced or controlled to ALARP before work commences.</i></p> <p>Document who is responsible for implementing the controls to manage each hazard identified.</p>	<p>Risk Rating refer to the risk matrix or HSEQT.PRO.Risk Mgt</p>
1.					
2.					
3.					
4.					
5.					

Audit



Process: insert// Procedure: Insert //		Date:	Audited by:	
		Location of Audit:	Area Mgr/Supervisor:	
Item	Question	Evidence Sited	Comments	Conformance Score 0,3,5
1.				
2.				
3.				
4.				
5.				
6.				
7.				
AUDITOR'S SIGNATURE:		CONFORMANCE SCORE: / 25	0 – Non-Conformance	
SAFETY REP'S SIGNATURE:		CONFORMANCE %:	3 – Continuous Improvement Opportunity	
			5 – Total Conformance	