Safety Policy and Procedure

Policy Number 039  
Authorization By: The Cianbro Companies  
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Title: Accountability – Zero Tolerance  
Effective Date: 05/02/02  

1 Status  
1.1 Update of existing policy, effective 12/06/10.  

2 Purpose  
2.1 To ensure consistency in the disciplinary measures enforced at Cianbro for the most severe violations of safety policy and procedures.  

3 Applicability  
3.1 This policy applies to all subsidiary companies and departments of the Cianbro Companies and includes all sites regardless of Cianbro’s relationship to the owner as either Prime or Subcontractor.  
3.2 All organizations are required to comply with the provisions of this policy and procedure.  

4 Definitions  
4.1 OJT: On the Job Training.  
4.2 Z.E.S.: Zero Energy State- Lockout/Tagout  

5 Policy  
5.1 We believe that the proper enforcement of disciplinary measures for violations of Cianbro’s safety policies and procedures will reduce a team member’s exposure to injury and illness.  
5.2 Cianbro expects managers to administer immediate disciplinary actions for unacceptable behavior or safety violations proportionate to the severity of the violation.  
5.3 Additionally, Cianbro expects managers to adopt a Zero Tolerance standard for violations of the following:  
5.3.1 Fall Hazards from Elevated Heights  
5.3.2 Zero Energy State  
5.3.3 Traffic Control of Vehicular Exposure to Work Area  
5.3.4 Control Access Zone  
5.3.5 Crane, Aerial Lifts, & Hoisting Equipment Operations.  
5.4 We expect our supervisors to lead safe and efficient projects and to exercise good judgment in holding their team members accountable for safe behaviors. For all other safety related areas, unsafe behavior or violations, supervisors shall apply their best judgment to determine the appropriate measure of disciplinary action following Cianbro’s Progressive Discipline Procedure in the Team Member handbook.  

6 Responsibilities  
6.1 The Corporate Safety Officer or designee is responsible to provide approval for any deviation from this policy unless spelled out specifically within the policy.  
6.2 The senior level of Cianbro management on the job site is responsible for the implementation of this policy on the project.  
6.3 Corporate Safety is responsible for maintaining this document.
7 Zero Tolerance - Safety Accountability Index

7.1 At Cianbro safety begins at the highest level, filtering down through all levels of the company. All team members share equal responsibility for working smart and safely as a condition of their continued employment at Cianbro. All team members have the responsibility to ensure, and the right to request safe work conditions.

7.2 Because we care about the well being of people, Cianbro places a safe work environment as our number one value. The most desirable outcome to Cianbro is that every team member goes home to their loved ones in the same condition they came to work.

7.3 Most Severe Violations
Below are the minimum measures to be administered for our most severe violations.

7.3.1 Fall Hazards from Elevated Heights
Team members working where fall hazards exist as outlined in Cianbro’s and/or host facility’s fall protection program, not protected or secured from falling by one of the OSHA and Cianbro approved methods (guard rail system, safety nets or 100% tied off). Note: Any deviation from this requirement must have a written Job Hazard Analysis that must be approved by the Corporate Safety Officer or designee.

7.3.2 Zero Energy State
Team members not following Cianbro and/or host facilities Zero Energy State (Z.E.S - lock and/or tag out) program(s).

7.3.3 Traffic Control of Vehicular Exposure to Work Area
Team members not following the detailed site-specific traffic control/activity plan.

7.3.4 Control Access Zone
Team members crossing or removing red (danger) tape without permission from an authorized member of the crew performing work within the danger zone. Radiation tape is the same as red (danger) tape.

7.3.5 Crane, Aerial Lifts and Hoisting Equipment Operations
(This section is limited to only this type of equipment)
- Team members knowingly operating such equipment with faulty safety systems without the project managers/superintendents approval and an alternate Job Hazard Analysis in place.
- Team members operating above equipment without being properly trained or enrolled in an approved training program.
- Team members improperly using above equipment or not following OSHA, Cianbro Policies and the manufacturer’s operating requirements.
- Team members operating above equipment within 20’ of an overhead power line, without a specific activity plan that follows Cianbro procedures and has the approval of the appropriate levels of review.
- Team members performing crane lifts (loads > 75% chart capacity etc.,) without completing the Cianbro "Pre-lift Checklist" and review/sign off, in accordance with Cianbro Crane Safety Policy and Procedure.
7.4 Accountability
Disciplinary Measures to be applied as a minimum for any violation listed in section 7.3.

7.4.1 First Offense- At a minimum one (1) full week off without pay (example: violation happened on a Wednesday so the team member is not eligible to return to work until the following Thursday after a time lapse of 7 days) documented in writing on a counseling report. Safe hours set back to zero. Removal of safe hour decal from hard hat. A Lesson Learned investigation will be completed by the project team and submitted to the Regional Near Miss Manager and to the Corporate Safety Department. If for some reason termination is warranted at this first offense the team member may be considered for work with Cianbro after 12 months, however, rehire requires V.P. of Human Resources, Safety & Health, and Senior V.P. Operations approval.

7.4.2 Second Offense (within one year from the first offense) - Immediate termination documented in writing on a counseling report. Safe hours set back to zero. Removal of safe hour decal from hard hat. Team member may reapply for work with Cianbro after 12 months however rehire requires approval of the V.P. of Human Resources, Safety and Health, and Senior V.P. Operations approval.

7.4.3 These minimum disciplinary measures can be increased up to termination of employment for the first offense if warranted by accumulative unsatisfactory performance or willful behavior because of the potential risk of serious injury or death upon approval by the V.P. of Human Resources, Safety & Health, and Senior V.P. Operations approval.

In order to ensure fairness in the process, any termination of a team member, due to an accountability issue, will require concurrence of the next highest level of authority. Any individual who feels they have not been treated fairly shall be given the opportunity to discuss their situation with the V.P. of Human Resources, Safety and Health, Senior V.P. Operations or other Senior Manager.

As a minimum standard:
Any manager or supervisor who knowingly allows a violation or an unsafe practice as covered in this Zero Tolerance - Safety Accountability policy and procedure is subject at a minimum to the same disciplinary action as the person in violation.

8 Budget / Approval Process
8.1 Not applicable.

9 Related Documents
9.1 References

| 011 Fall Protection Program |
| 016 Zero Energy State Lock Out-Tag Out |
| 028 Crane Safety |
| 035 Work Zone Traffic Control |
| 040 Work Area Barricade Protection |