Safety Policies, Procedures & Responsibility

Safety and Health Policies and Procedures

S.C. Swiderski, LLC, and its Affiliates

Safety & Compliance Manager
Blain A. Schumacher
715-693-7832 | 715-393-7596 (Mobile)
blain.schumacher@scswiderski.com or safety@scswiderski.com

S.C. Swiderski, LLC
401 Ranger St.
Mosinee, WI. 54455
715.693.9522

New Employee Orientation

Purpose

S.C. Swiderski, LLC regards their employees as vital parts of the Company. As such, S.C. Swiderski, LLC accepts the responsibility of providing a workplace where the worker can do his/her job without injury to him/her or to others.

The orientation is designed to increase the safety awareness of the individual worker and all the supervisors on the project by getting the supervisor directly involved with the training of his/her workers. It strives to impress on the employee the seriousness of the safety commitment of their supervisors and S.C. Swiderski, LLC. The Orientation trains the employees in specific hazard recognition and promotes communication between individual crafts, departments' management, and employees.

Policy

A representative of the Human Resources Department meets with each new employee and reviews contents of the SCS HR Portal. A representative of the Corporate Safety Department meets with each new employee and demonstrates how to navigate to the SCS Safety Portal to access the S.C. Swiderski, LLC Contractor's Safety Policy Manual.

During the orientation, all new personnel review the job specific assigned safety and compliance training via Paylocity. Each new employee will complete an orientation question and answer segment while viewing the videos.

All new personnel are required to complete acknowledgements for Safety Orientation and Hazard Communication. The acknowledgements are kept on file by Human Resources via Paylocity.

The new employee may also receive hands-on training during the orientation process.

Hands-on training will include:

- Full Body Harness and other Fall Protection Equipment and Use
- Personal Protective Equipment
- Other topics may be added as determined by the Safety & Compliance Manager

Safety Policy and Revisions

It is the policy of S.C. Swiderski, LLC to provide a safe and healthy place to work for its employees, customers, tenants, subcontractors, and visitors. To maintain a successful safety program, it must embody cooperation and the proper attitudes toward accident prevention and safety awareness on the part of all employees at S.C. Swiderski, LLC, and its Affiliates.

All work activities will comply with regulations, protect against personal injury and property damage, and limit the company's risk of unnecessary financial burdens or reduced efficiency due to accidents. Only through a cooperative effort can a safety record in the best interest of all be established and maintained.

Policy Objectives

In keeping with S.C. Swiderski, LLC commitment to safety, we have implemented this policy to meet the following objectives:

1. To provide development and implementation of safety and health policies, programs and implementing procedures designed to provide a safe and healthful working environment for all employees, our customers, visitors, vendors, suppliers, subcontractors, and members of the public.
2. To reduce the potential of accidental injuries to persons and to protect the property of S.C. Swiderski, LLC: employees, customers, and public. Minimizing the occurrence of incidents, the consequences of which may drastically affect the safety and future of S.C. Swiderski, LLC projects and facility operations.
3. To cooperate with subcontractors and other clients in their efforts to contribute to safe and efficient operations, and to comply with applicable federal, state, and local statutes, standards, and regulations.
4. Exercise good judgment in the application of S.C. Swiderski, LLC Corporate Safety & Health Policy, and Procedure.

Policy Applicability

This policy will apply to all regular full-time, part-time, commissioned, seasonal, or contract employees of S.C. Swiderski, LLC. Compliance with the policy will be required as a condition of employment or continued employment with S.C. Swiderski, LLC, and its Affiliates. This policy also applies to all S.C. Swiderski, LLC operations including but not limited to, suppliers, owners' representatives, agents of the architect or engineer, regulative authorities, visitors, vendors, and invitees.

It is a condition of all subcontractors and contracts issued by S.C. Swiderski, LLC, and its Affiliates that applicable Local, State, and Federal Codes be followed. It is a condition of

all subcontractors and contracts issued by S.C. Swiderski, LLC and its Affiliates that all OSHA regulations and guidelines be followed at all times. Failure to comply is a breach of contract terms.

These policies documented in this Safety Program applies to S.C. Swiderski, LLC ("SCS" or "the Company") and its Affiliates.

Program Responsibilities

S.C. Swiderski, LLC written Safety and Health Program contains detailed procedures and guidelines, along with specific management, supervisor and employee responsibilities designed to implement the Company Safety and Health Policy. Each employee of S.C. Swiderski, LLC shall acknowledge receipt of the Safety and Health Program.

Objectives, policy, guidelines, accountability, follow-up, training, education, and a way to measure effectiveness are all elements of working safety and health programs that comply with applicable local, state, and federal safety and health standards. It shall be our philosophy that our efforts towards production, quality, safety, and health must be inseparable. Through the implementation of this program, every attempt will be made to reduce the possibility of an accident or illness occurring.

REVISIONS

Purpose

To update this program with changes and/or revisions of any material in this manual because of Governmental changes in Safety Standards/Procedures or any changes in S.C. Swiderski, LLC Safety Policies.

Responsibility

The Corporate Safety & Compliance Manager will be responsible for reviewing the manual at least annually and issuing any revisions as needed. Urgent revisions may be communicated at any time.

Policy

Upon review of this program, the Safety & Compliance Manager shall issue updates and/or changes to all holders of this manual electronically via the SCS Safety Portal and Paylocity. All acknowledgements will be completed via Paylocity.

Safety Posters

S.C. Swiderski, LLC is required to post certain employment-related information. The required information is maintained on the bulletin board, general office (at all locations – properties and job sites), and SCS HR Portal where employees can find the following required posters at any time:

Labor Law

- Employees Rights under Wisconsin's Business Closing/Mass Layoff Notification Law
- Notice to Employees About Applying for Wisconsin Unemployment Benefits
- Wisconsin Bone Marrow and Organ Donation Leave Act
- Wisconsin Fair Employment Law
- Wisconsin Family and Medical Leave Act
- Wisconsin Minimum Wage Rates
- Hours and Times of Day Minors May Work in Wisconsin
- Hazardous Chemicals in the Workplace?
- Retaliation Protection for Health Care Workers in Wisconsin
- Employee Protections Against Use of Honesty Testing Devices
- Notification Required When Employers Decide to Cease Providing a Health Care Benefit Plan
- Know Your Rights
- FLSA Minimum Wage
- Employee Polygraph Protection Act (EPPA)
- Nursing Employees
- Pay Transparency
- USERRA
- Right to Work
- Federal FMLA
- Equal Opportunity is THE LAW

OSHA Safety & Health Protection on the Job

- OSHA Job Safety and Health: It's the Law!

In addition to the above-listed notices, a copy of this injury prevention program, a log, and summary of Occupational Injuries and Illnesses, a copy of S.C. Swiderski, LLC's code of Safe Work Practices and a Fire Prevention and Evacuation Plan will be posted in the common areas on each site. (i.e. Job trailers, breakrooms, etc.) and the SCS Safety Portal.

Safety Data Sheets

The SDS includes information such as the properties of each chemical; the physical, health, and environmental health hazards; protective measures; and safety precautions for handling, storing, and transporting the chemical. The information contained in the SDS must be in English (although it may be in other languages as well).

Safety Data Sheets for S.C. Swiderski, LLC's premises are available with the SCS Safety Portal via a QR Code to Velocity EHS. When employees are required to work on the premises of any other employer, such as a service call or installation situation, the job site will maintain a collection of a Safety Data Sheets that describe any hazards unique to that site. Check with the other employer's job site coordinator or supervisor for the exact location of the SDS information.

In addition to these required safety postings, emergency numbers are maintained in the SCS Safety Portal.

OSHA's Hazard Communication Standard



In the case of a real emergency CALL 911!

State your name, the nature of the emergency, and the exact location of the injury. Answer all questions completely.

Do NOT use 911 for *non-emergency* calls to police or fire departments.

Safety Policy Responsibility

Purpose

An effective safety program includes a complete and clear description of safety responsibilities for all employees. It is important for all employees to understand not only ***their*** responsibilities, but also the responsibilities of ***fellow*** employees.

Policy

All levels of management and supervisors are charged with the responsibility of preventing conditions that could lead to occupational injuries or illness. While the ultimate success of our safety and health program depends upon the full cooperation of each employee, it is management's responsibility to see that effective training and education programs are followed to the best advantage possible.

Corporate Safety & Compliance Manager

- Set an example of safe working habits and follow all safety regulations.
- Assist in establishing annual company safety goals.
- Monitor all safety and workers compensation statistics.
- Manage special safety programs.
- Promote safety.
- Distribute safety-related publications and reports.
- Provide required training to employees in accordance with established project site requirements.
- Work as a team with estimators, project managers, and superintendents in safety pre-planning sessions prior to letting of bids to subcontractors.
- Attend pre-job meetings with all subcontractors and discuss/review with each, the S.C. Swiderski, LLC and its Affiliates, and OSHA environmental, safety and health policies and procedures, which will require their compliance at the project site.
- Assist Project Supervision with safety activities and reporting issues.
- Accompany and properly document any events arising out of OSHA inspections, corporate safety visits and other formal type safety inspections conducted at the project site by outside agencies, logistics permitting.
- Monitor Safety Program activity at all projects.
- Conduct project safety visits for each location.
- Evaluate site superintendent's safety performance.
- Follow-up on all reported safety violations to ensure corrective action is taken.
- Perform timely and accurate accident reporting.
- Recommend improvements in the Safety Program.

- Review all accidents and investigation reports.
- Classify all occupational injuries and illnesses per OSHA Recordkeeping Practices (includes factual, alleged and/or exaggerated injuries or illnesses).
- Track all safety and workers compensation statistics.
- Evaluate the need for and requisition personal protective equipment, fire protection equipment, and other safety-related equipment required to fit the project sites needs during Construction Operations.
- Monitor the administration of the project site first aid services and develop emergency rescue plan.
- Review and approve/disapprove any required job-made tool.
- Maintains the SCS Safety Portal.
- Create and post weekly Toolbox Talks via Paylocity to all construction field and office staff.

Human Resources

- Set an example of safe working habits and follow all safety regulations.
- Promotes safety as a culture.
- Organizes and conducts safety training programs for employees at all levels.
- Ensures that the company complies with all relevant safety and compliance regulations and standards.
- Assists in and leads (at times) investigations and progressive discipline to determine needs for corrective actions for all violations in safety, workplace conduct, and compliance.
- Fosters awareness, encouraging open communication about safety concerns, and recognizing and rewarding employees for safe behavior.
- Assists in managing the worker's compensation process, including handling claims, coordinating medical treatment for injured employees, and facilitating return-to-work programs to help injured employees' transition back into the workforce.
- Provides reporting and tracking on safety and compliance metrics.
- Works with other departments and the Safety & Compliance Manager to develop and maintain emergency response plans and procedures.
- Maintains the SCS HR Portal and supports maintenance of the SCS Safety Portal.
- Administers, and verifies completion and compliance of all Paylocity trainings.
- Primary point of contact when handling Reasonable Suspicion and all post-accident drug testing.

Construction Manager - Field Operations

- Set an example of safe working habits and follow all safety regulations.
- Assist in establishing annual company safety goals.
- Promote safety.
- Distribute safety-related publications and reports.
- Follow-up on training provided to employees in accordance with established project site requirements.
- Work as a team with estimators, project managers, and superintendents in safety pre-planning sessions prior to letting of bids to subcontractors.
- Attend pre-job meetings with all subcontractors and discuss/review with each, the S.C. Swiderski, LLC and its Affiliates and OSHA environmental, safety and health policies and procedures, which will require their compliance at the project site.
- Communicate safety information to the sub-contractors.
- Assist Project Supervision with safety activities and reporting issues.
- Accompany and properly document any events arising out of OSHA inspections, corporate safety visits and other formal type safety inspections conducted at the project site by outside agencies, logistics permitting.
- Follow-up on all reported safety violations to ensure corrective action is taken.
- Recommend improvements in the Safety Program.
- Review all accidents and investigation reports.
- Evaluate the need for and requisition personal protective equipment, fire protection equipment, and other safety-related equipment required to fit the project sites needs during construction operations.

Project Manager

- Set an example of safe working habits and follow all safety regulations.
- Promote safety on all jobsites.
- Become familiar with site specific safety procedures.
- Communicate with the Safety & Compliance Manager the need for safety related items or trainings.
- Communicate with subcontractors the requirements of adhering to the safety plan.
- Follow-up with staff and subcontractors on any reported and documented safety infractions
- Work as a team with the Construction Manager and Safety & Compliance Manager in safety pre-planning sessions prior to commencing on site work.

Site Superintendent (incl. Seniors and Assistants)

- Set an example of safe working habits and follow all safety regulations.
- Responsible for the safety of their employees as well as the safety of sub-contractors and others who may enter their work area.
- Attend safety pre-planning meetings.
- Maintain first aid kit supplies and reorder when needed.
- Perform daily equipment inspection logs for rough terrain forklifts, aerial lifts, and skid steers (if applicable).
- Communicate and enforce all safety policies and procedures within their operations.
- See that essential safety devices and personal protective equipment are provided and used.
- Inspect daily all work areas to ensure that work practices and equipment are meeting established safety standards, Complete Site Safety Checklist, "Exhibit A "
- Take immediate corrective action whenever unsafe conditions and/or unsafe acts are noted.
- Instruct employees as to the hazards of the job, how to avoid injury, and appropriate emergency procedures.
- Assist in the training of new and established employees.
- See that all injuries are promptly treated and reported.
- Investigate the cause of all accidents and injuries and complete reports as required.
- Keep all work areas free from debris.
- Assess results of their actions on site safety.
- Hold Monday safety site huddle; and read and acknowledge weekly Toolbox Talks via Paylocity

Field Staff (Const., Maintenance, & Grounds)

Field Staff Employees (General Laborers, Trades, Carpenters, Framers, Crew Leads)

- Set an example of safe working habits and follow all safety regulations.
- Perform all duties in a safe manner.
- Read, understand, and follow all company safety policies and procedures.
- Wear all personal protective equipment that is required and maintain the equipment in good condition.
- Report all unsafe acts and conditions.
- Report all accidents and injuries to Foreman or Site Superintendent immediately.
- Promote safety.
- Keep all work areas free from debris.
- Assess results of their actions on site safety.
- Read and acknowledge weekly Toolbox Talks via Paylocity.

Grounds and Maintenance Employees

- Set an example of safe working habits and follow all safety regulations.
- Perform all duties in a safe manner.
- Read, understand, and follow all company safety policies and procedures.
- Wear all personal protective equipment that is required and maintain the equipment in good condition.
- Report all unsafe acts and conditions.
- Report all accidents and injuries to Foreman or Site Superintendent immediately.
- Promote safety.
- Keep all work areas free from debris.
- Assess results of their actions on site safety.
- Read and acknowledge weekly Toolbox Talks via Paylocity.

All Other Employees

- Set an example of safe working habits and follow all safety regulations.
- Perform all duties in a safe manner.
- Read, understand, and follow all company safety policies and procedures.
- Wear all personal protective equipment that is required and maintain the equipment in good condition.
- Report all unsafe acts and conditions.
- Report all accidents and injuries to Foreman or Site Superintendent immediately.
- Strive to make all operations safe.
- Maintain physical and mental health necessary to work safely.
- Keep all work areas free from debris.
- Assess results of their actions on site safety.
- Repair or replace safety precautions removed or altered before leaving the area.
- Promptly report all accidents and injuries whether involving S.C. Swiderski, LLC personnel or others.

Const. & Bldg. Supply Subs & Suppliers

- Prior to the commencement of work, the subcontractor shall provide the name of their safety representative to SCS Safety & Compliance Manager. This representative must be assigned to the project and be responsible for the administration and enforcement of the safety program. The safety representative may be required to meet with the SCS Safety & Compliance Manager to review and discuss the safety regulations to be adhered to on-the-job site.
- Abide by all applicable safety rules of Local, State and Federal Regulations.
- Subcontractors are required to submit their company safety program to the S.C. Swiderski, LLC Safety & Compliance Manager prior to commencing onsite work.

- The subcontractor will ensure that their safety program is in compliance with all existing safety and health requirements of local, state, and federal regulatory agencies. Where applicable, this may include, but not be limited to, hazard communication training, personal protective equipment training, fall protection, and respiratory protection training.
- The subcontractor/supplier is responsible for all employees working for subcontractor/supplier, and for all other persons calling on subcontractor/supplier or doing business with subcontractor/supplier while on a S.C. Swiderski, LLC job site.
- Notify all other contractors when actions or activities undertaken by them could affect the health or safety of employees of other contractors.
- Check in with jobsite superintendent/supervisor before entering job site.
- Inform Site Superintendent of all injuries to workers. If they are not available, the subcontractor and/or supplier must contact the Safety & Compliance Manager.
- Inform Site Superintendent or Supervisor of all damage to property or equipment. If they are not available, the subcontractor and/or supplier must contact the Construction Manager – Field Operations.
- Report to the Safety & Compliance Manager any unsafe conditions that come to their attention.

Visitors (Inc. Prospective Tenants) to Sites

- Abide by all safety rules.
- Check with the S.C. Swiderski, LLC Superintendent, so appropriate personal protective equipment may be provided.
- Refrain from entering site before notifying S.C. Swiderski, LLC Superintendent.
- Be escorted by the Property Manager or Site Superintendent while on site.

Owners of single-family homes who wish to evaluate the property for the purposes of decision-making / design inspections may be escorted by the listing agent OUTSIDE of the normal workday and during INACTIVE construction times. Coordination with the Site Superintendent must take place prior to eliminate potential hazards including but not limited to: Protruding nails, screws, and other objects. Trip hazards and potential overhead obstructions must be removed or flagged. Hard hats, safety glasses, hi-vis and closed toed shoes are required. (Crocs, Hey Dudes, or similar soft soled shoes are not permitted.) Tennis shoes are allowed in this circumstance.

Company Policy & Information

Safety & Compliance Manager

Per S.C. Swiderski, LLC's Safety and Health Program, **Blain A. Schumacher** has been designated as our "Safety & Compliance Manager" and has the overall responsibility and authority to develop, implement, maintain, administer, and enforce S.C. Swiderski, LLC and its Affiliate's safety and health policies and procedures.

The functions of the Safety & Compliance Manager are divided into five areas:

1) Operations
2) Health Physics
3) Engineering Services / Occupational Safety
4) Industrial Hygiene
5) Environmental Protection

Duties

To fulfill this objective the Safety & Compliance Manager is required to:

1. Provide management at all levels with the information, advice, and assistance needed to formulate S.C. Swiderski, LLC's safety and health policy, directives, procedures, and standards.

2. Assist management at all levels in establishing and maintaining a safe and healthful working environment free from unacceptable risks, in conformance with OSHA safety and health guidelines, and in compliance with applicable standards, codes, and regulations.

3. Monitor operations within S.C. Swiderski, LLC and, where appropriate at off-site facilities, provide management with the information needed to maintain a safe and healthful working environment, free from unacceptable risks.

4. Develop and provide general safety education and training programs. Assist in the development of specific job safety training programs.

5. Develop plans and train response personnel to control emergency situations (weather related, injury, fire, etc.).

6. Provide safety health support services assigned by the Company Officer to whom the Safety & Compliance Manager reports.

7. Maintain a staff of specialists or consultants knowledgeable in all areas of safety.

8. Prepare and maintain S.C. Swiderski, LLC's Safety and Health Manual and other documents that relate to safety.
9. Specify proper protective equipment for issuing to employees.
10. Check plans of all new projects for construction safety, industrial safety, and other safety reviews as required by OSHA and S.C. Swiderski, LLC regulations.
11. Stop hazardous operations where life hazard or major property damage is imminent and follow with documented evidence.

To carry out its responsibilities, the Safety & Compliance Manager maintains relationships with specialists and outside consultants in the appropriate environment, health, and safety disciplines.

These disciplines may include Construction Safety, Engineering Services, Environmental Protection, Industrial Hygiene, Mechanical Safety, Non-destructive Testing, Occupational Safety, and Safety Training.

As part of the job, the Safety & Compliance Manger will supplement this written injury and illness prevention program by:

1. Establishing workplace objectives and safety recognition programs.
2. Working with all government officials in both accident investigation and safety inspection procedures; maintaining safety and individual training records.
3. Encouraging reporting of unsafe conditions and promoting a safe workplace.

Some of these functions may be delegated in whole or in part to staff, your immediate supervisor, and/or outside consultants for implementation.

1. Develop and implement rules of safe practices for each function within the company.
2. Develop and implement safe operating rules for the use of electrical and mechanical equipment consistent with the manufacturer's recommendations and specifications.
3. Develop and implement a system to encourage employees to report unsafe conditions immediately.
4. Conduct a thorough investigation of each accident, whether it results in an injury, to determine the cause of the accident and to prevent a recurrence. In cases of a known injury accident, the investigation shall proceed only after consultation with S.C. Swiderski, LLC attorneys, who shall direct the investigation (the product of which investigation shall be considered the work product of the attorney).
5. Instruct supervisors in safety responsibilities.

6. Conduct scheduled and unscheduled inspections to identify and correct unsafe working conditions. Special attention shall be given to noticing serious concealed dangers.

7. Maintain records of training, periodic inspections, corrective actions, and investigations as required by law.

The Safety & Compliance Manager's mobile phone, office telephone number, email address, and any other contact information is posted on the bulletin board where all other safety information is routinely maintained.

Internal Safety Violation Procedures

Disciplinary Procedures:

The Employee Compliance Program has been designed to encourage individuals to improve their performance and align them with S.C. Swiderski's safety culture. If an employee engages in unacceptable performance or conduct, then disciplinary action may be required. To maintain a safe and healthy workplace, employees must be cognizant and aware of all company, state, and federal health and safety regulations, as they apply to their job-specific duties.

The following corrective action plan is in effect immediately. It will be applied to health and safety violations unless the seriousness of the violation dictates skipping or repeating certain steps. After 9 months have passed since their previous infraction, the employee will have one corrective action dismissed as it pertains to the corrective action plan. All violations will be documented in Paylocity for record-keeping.

If an employee knowingly and willingly violates safety rules or procedures, puts themselves or others in imminent danger, or violates company policy, the employee may be discharged immediately.

Safety Violation Progressive Discipline:

1. Verbal Coaching Conversation
2. Verbal Warning (documented in employee fie)
3. Written Warning
4. Unpaid suspension (length determined by management)
5. Termination

EXAMPLES OF VIOLATIONS (not conclusive list):

- Not wearing PPE: Hard Hat, High Visibility Vests/Shirts
- Not reading Toolbox Talks
- Operating equipment without training
- Not reporting injuries/incidents
- Not using fall protection were needed.
- Creating or knowingly exposing other to safety hazard

- Walking under suspended loads

SCS Safety Violation Form via Paylocity (Journals) to be completed for all violations.

Handbook Policies

SCS's Employee Handbook can be found via Paylocity (Company links) or the SCS HR Portal at any time. Handbook Winter 2023

Workplace Safety & Reporting

Section 9 - Workplace Safety

9-1. Health and Safety

The health and safety of employees, tenants, subcontractors, and others on Company property are of critical concern to S.C. Swiderski, LLC. The Company intends to comply with all health and safety laws applicable to our business.

Accident prevention and safety is everyone's responsibility. To this end, we must rely upon employees to ensure that work areas are kept safe and free of hazardous conditions. When performing tasks related to your employment, always be aware of the impact your actions may have on co-workers and other individuals in the vicinity of your work area. Garbage should be placed in the proper containers and work areas should be maintained free of debris to assure safe working environments. When working on a job site under construction or while performing maintenance repairs, employees should always lift objects appropriately and ask for assistance when necessary. Dollies are available and should be used when moving appliances and heavy objects. Employees are required to be conscientious about workplace safety, including proper operating methods, and recognize dangerous conditions or hazards. Any unsafe conditions or potential hazards should be reported to management immediately, even if the problem appears to be minor or corrected. Any suspicion of a concealed danger present on the Company's premises, or in a product, facility, piece of equipment, process or business practice for which the Company is responsible should be brought to the attention of management immediately.

As part of the orientation process, employees will participate in safety awareness training as it relates to their position within the organization, along with introduction and acclimation to personal protective equipment (PPE). Proper safety attire, including but not limited to hard hats, safety shoes/boots, safety glasses, hearing protection, fall protection, work gloves, and long pants and shirts should be worn to minimize risks to employees while operating equipment and working in hazardous areas. All employees are required to wear closed-toed shoes and required construction PPE when visiting active construction sites.

For employees driving company vehicles, and/or operating company equipment are required to complete the visual pre-trip and post-trip inspections of the vehicles. For employees towing a trailer, the driver is required to ensure that the load is secured and all safety protocols are in place prior to dispatch. Should an employee operating a commercial motor vehicle pull off the road, they must observe all requirements necessary for proper off-road techniques including activating the flashers and proper placement of the warning triangles. Employees in certain driving positions where governing entities have enforcement of protocol will be given a handbook addendum along with supplemental materials outlining driving requirements.

Periodically, the Company may issue rules and guidelines governing workplace safety and health. The Company may also issue rules and guidelines regarding the handling and disposal of hazardous substances and waste. All employees should familiarize themselves with these rules and guidelines, as strict compliance will be expected.

Any workplace injury, accident, or illness must be reported to the employee's supervisor as soon as possible, regardless of the severity of the injury or accident. It is the responsibility of the employee to complete a First Report of Injury/Illness Report within 24 hours of the incident and notify and provide the report to Human Resources within 24 hours. It is the responsibility of the supervisor to notify Human Resources and follow the appropriate checklist criteria based on report-only or recordable accidents. Non-compliance by the employee to report and complete the incident paperwork could potentially jeopardize payment of the claim. Although a claim may be covered under Worker's Compensation Insurance, the employee is not void of disciplinary action if the injury was a result of a safety infraction or if the employee failed to immediately report any on-the-job injury/illness, no matter how significant.

All Employee Injury Forms are available on the SCS Safety Portal.

Drug-Free Workplace Policies

To help ensure a safe, healthy, and productive work environment for our employees and others, to protect Company property, and to ensure efficient operations, S.C. Swiderski, LLC has adopted a policy of maintaining a workplace free of drugs and alcohol. This policy applies to all employees and other individuals who perform work for the Company.

The unlawful or unauthorized use, abuse, solicitation, theft, possession, manufacture, transfer, purchase, sale or 46 distribution of controlled substances (including medical marijuana), drug paraphernalia or alcohol by an individual anywhere on Company premises, while on Company business (whether or not on Company premises) or while representing the Company, is strictly prohibited. Employees and other individuals who work for the Company also are prohibited from reporting to work or working while they are using or under the influence of alcohol or any controlled substances, which may impact the employee's ability to perform their job or otherwise pose safety concerns, except when the use is pursuant to a licensed medical practitioner's instructions and the licensed medical practitioner authorized the employee or individual to report to work. However, this exception does not extend any right to report to work under the influence of medical marijuana or to use medical marijuana as a defense to a positive drug test, to the extent the employee is subject to any drug testing requirement, except as permitted by and in accordance with applicable law. This restriction does not apply to responsible drinking of alcohol at business meetings and related social outings.

Violation of this policy will result in disciplinary action, up to and including termination.

As a condition of employment, employees must abide by the terms of this policy and must report to their manager within five (5) days of a conviction for a state or federal drug offense occurring on company premises or off company premises while conducting company business. Where state law imposes more stringent reporting requirements, employees receive notices of and must abide by the state reporting requirements**. Employees in certain positions, such as roles that involve operating heavy equipment or where certain licenses are required to operate such equipment or company vehicles may risk continued employment if testing positive for the presence of alcohol and/or drugs (pre-employment drug screening, random testing requirements, reasonable suspicion, and post-accident testing) while on duty as per state and federal regulations.**

Substance Abuse Policy & Reasonable Suspicion

9-3. Substance Abuse Policy

S.C. Swiderski, LLC is committed to protecting the safety, health, and well-being of all employees, tenants, subcontracts and other individuals in our workplace and on all our properties. We recognize that alcohol abuse and drug use pose a significant threat to our goals. We have established a drug-free workplace program that balances our respect for individuals with the need to maintain a safe work environment. We encourage employees to voluntarily seek help with these addictions and reach out to Human Resources for additional resources or support.

The use, possession, purchase, sale, distribution, or being under the influence of any illegal drug and/or the misuse of legal drugs while on company or client premises or while performing services for the company is strictly prohibited. S.C. Swiderski, LLC also prohibits reporting to work under the influence of alcohol, illegal or synthetic drugs, or misuse of legal drugs, such as taking drugs prescribed for someone else, or in excess of the amount prescribed by your doctor.

Where there is reasonable suspicion that an employee is under the influence of illegal drugs or alcohol while working on S.C. Swiderski, LLC premises or operating company-owned vehicles or equipment, the employee may be required to promptly submit to a drug and/or alcohol test.

All employees and subcontractors who are involved with, who may have contributed to, an incident that results in property damage or requires treatment beyond first aid are required to submit to a drug screen and alcohol test. The company may also require a drug screen and/or alcohol test for incidents resulting in first aid treatment.

Employees who test positive, attempt to delay submission, or refuse to submit to a drug and/or alcohol screening will be subject to discipline, up to and including immediate termination. Subcontractors will be immediately removed from the workplace and may be banned from working on S.C. Swiderski, LLC job sites.

Company forms for Reasonable Suspicion are available on the SCS Safety Portal.

Workplace Violence

S.C. Swiderski, LLC is strongly committed to providing a safe workplace. The purpose of this policy is to minimize the risk of personal injury to employees and damage to Company and personal property.

S.C. Swiderski, LLC does not expect employees to become experts in psychology or to physically subdue a threatening or violent individual. Indeed, S.C. Swiderski, LLC specifically discourages employees from engaging in any physical confrontation with a violent or potentially violent individual. However, S.C. Swiderski, LLC does expect and encourage employees to exercise reasonable judgment in identifying potentially dangerous situations.

Experts in the mental health profession state that prior to engaging in acts of violence, troubled individuals often exhibit one or more of the following behaviors or signs: over-resentment, anger and hostility; extreme agitation; making ominous threats such as bad things will happen to a particular person, or a catastrophic event will occur; sudden and significant decline in work performance; irresponsible, irrational, intimidating, aggressive or otherwise inappropriate behavior; reacting to questions with an antagonistic or overtly negative attitude; discussing weapons and their use, and/or

brandishing weapons in the workplace; overreacting or reacting harshly to changes in Company policies and procedures; personality conflicts with co-workers; obsession or preoccupation with a co-worker or supervisor; attempts to sabotage the work or equipment of a co-worker; blaming others for mistakes and circumstances; or demonstrating a propensity to behave and react irrationally.

Prohibited Conduct

Threats, threatening language or any other acts of aggression or violence made toward or by any Company employee WILL NOT BE TOLERATED. For purposes of this policy, a threat includes any verbal or physical harassment or abuse, any attempt at intimidating or instilling fear in others, menacing gestures, flashing of weapons, stalking or any other hostile, aggressive, injurious, or destructive action undertaken for the purpose of domination or intimidation. To the extent permitted by law, employees and visitors are prohibited from carrying weapons onto Company premises.

Procedures for Reporting a Threat

All potentially dangerous situations, including threats by co-workers, should be reported immediately to any member of management with whom the employee feels comfortable. Reports of threats may be maintained confidential to the extent that maintaining confidentiality does not impede S.C. Swiderski, LLC's ability to investigate and respond to complaints. All threats will be promptly investigated. All employees must cooperate with all investigations. No employee will be subjected to retaliation, intimidation, or disciplinary action as a result of reporting a threat in good faith under this policy.

If the Company determines, after an appropriate good faith investigation, that someone has violated this policy, the Company will take swift and appropriate corrective action, which may include suspension without pay up to and including termination.

Employees should promptly inform Human Resources of any protective or restraining order that they have obtained that lists the workplace as a protected area. If the employee is the recipient of a threat made by an outside party, that employee should follow the steps detailed in this section. It is important for the Company to be aware of any potential danger in its offices or worksites. Indeed, the Company wants to take effective measures to protect everyone from the threat of a violent act by employees or by anyone else. The Company is committed to supporting victims of intimate partner violence by providing referrals to community resources and providing time off for reasons related to such violence.

Workplace Bullying

S.C. Swiderski, LLC defines bullying as "repeated inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment." Such behavior violates the company Code of Ethics which clearly states that all employees will be treated with dignity and respect.

The purpose of this policy is to communicate to all employees, including supervisors, managers, and executives, that the company will not tolerate bullying behavior. Any employee violating this policy will be subject to disciplinary action, which may include suspension without pay up to and including termination.

Bullying may be intentional or unintentional. However, it must be noted that where an allegation of bullying is made, the intention of the alleged bully is irrelevant and will not be given consideration when meting out discipline. As in sexual harassment, it is the effect of the behavior upon the individual that is important. The Company considers the following types of behavior; examples of bullying:

- **Verbal bullying:** To slander, ridiculing or maligning a person or their family; persistent name-calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks; and gas-lighting.
- **Physical bullying:** Pushing, shoving, kicking, poking, tripping, assault, or threat of physical assault; damage to a person's work area or property.
- **Gesture bullying:** Non-verbal threatening gestures or glances that convey threatening messages.
- **Exclusion:** Socially or physically excluding or disregarding a person in work-related activities.

Safety Equipment

9-6. Safety Equipment

Certain articles of clothing are required for safety and are not part of the annual benefit allowance. A high visibility vest and/or shirt and hard hat will be provided for each applicable employee. It is the responsibility of each employee to keep these items secured and available for wear everyday while on the job site. If an employee is negligent in keeping and maintaining their required safety items, replacement items will be provided for the employee and a possible deduction made from the employee's paycheck to cover the cost of replacement. If your safety items become worn or become defective at any time, employees are required to notify their supervisor, project manager, or Human Resources to obtain a replacement.

If an employee fails to return issued safety equipment in good condition, the company reserves the right to deduct the cost of the unreturned or damaged equipment from the employee's last paycheck. Please see Human Resources with any questions regarding this policy.

All company property and safety equipment is due to the supervisor or human resources within 24 hours of the last day of work.

Return-to-Work Program

9-7. Return-to-Work Program

Under Wisconsin Worker's Compensation law, there is no legal guarantee that a job will be available to you after an injury. The employer is not required to hold a position open or create a new position once you are released to return to work. S.C. Swiderski, LLC is committed to utilizing its resources to provide a safe work environment for all employees. If a work-related injury does occur, S.C. Swiderski, LLC is committed to returning the injured worker to productive employment as soon as possible.

S.C. Swiderski, LLC will make every effort to provide transitional work assignments or project work until an injured employee is able to resume their normal duties. All modified work is on a temporary basis and is intended to facilitate return to the employee's regular work duties when medically feasible. This program will be managed and monitored to ensure the employee reaches the end of healing.

Refusal to participate in the modified/restricted duties and/or failure to follow the Return-to-Work-Program may result in worker's compensation benefits being limited or suspended.

Company Safety Rules

The purpose of safety rules is to acquaint each employee with a set of safe working rules and procedures that will help you to provide a safe workplace. It is well understood that employees and their families are the beneficiaries of a good safety and health program.

No safety and health program can cover all conditions that might arise; therefore, it is necessary for employees to use their best judgment along with the observance of established job safety practices. It is necessary to have the cooperation of employees to promote workplace safety and health. If employees do not completely understand all the job procedures and safety rules, they should ask their supervisor for an explanation prior to starting work. It is management's responsibility to provide employees with equipment and methods that result in safe work performance. However, it is the employee's responsibility to work according to established procedures.

Minors On Site

Sometimes our sites have minors working or visiting on site. Please use the DWD – Wisconsin Employment of Minors Guide for clarification and regulations.

General Construction Rules

Compliance with the following safety rules and guidelines are required of all employees as a condition of continued employment with S.C. Swiderski, LLC. These rules are minimum requirements and are only intended to cover average conditions. Employees shall use good judgment in dealing with conditions not covered in these rules and, when in doubt, should consult their supervisor.

1. Employees working in areas where there is a possible danger of head injury from impact, or from falling or flying objects or from electrical shock and burns, shall be protected by protective helmets.
2. Employees shall use care in the performance of their duties and act in a manner that will assure maximum safety for themselves, fellow employees, other contractors, and the general public.
3. Report all injuries and illnesses, no matter how minor, to their supervisor. This will prevent today's minor injury from becoming tomorrow's major injury.
4. On-the-job illness, excessive fatigue and any other impairment shall be reported to the supervisor, so possible accident situations can be avoided.
5. Work areas, vehicles and the inside and outside access ways of buildings shall be kept clean.
6. Waste materials shall be disposed of properly and not be allowed to accumulate in work areas.
7. If employees see something unsafe, they should immediately report this to their supervisor and if they can safely do so, correct it. Do not wait for an accident to happen and then be told to correct the problem.
8. Use the right tool for the right job. Keep tools in good, clean condition. If replacement parts are needed, employees shall ask their supervisor for the necessary part.
9. Use, adjust and repair only tools and equipment for which they have been trained and authorized to use.
10. Employees shall follow all company written and oral instructions to safely perform their jobs.
11. Authorized employees shall give special instructions and assistance to new employees who are not familiar with the work.
12. No jewelry should be worn during work to avoid snags on objects.
13. Loose or ragged clothing shall not be worn while working around machinery, moving parts or belts.
14. Observe and obey all posted "No Smoking" areas, offices, and buildings.
15. Learn the location of emergency phone numbers, first aid kits, fire extinguishers, emergency equipment, fire alarms, and emergency evacuation routes.
16. Use good manners and common sense. Avoid distracting others.
17. Use the sanitation facilities, keep them clean and do not abuse them.
18. Lift correctly - with the legs, not the back. If the load is heavy, GET HELP.
19. Running on the job is prohibited, except in obvious emergencies.
20. Employees shall observe and obey all caution and danger signs, barricades, and safety permit tags that are placed on the jobsite or in the shop.
21. Employees shall not use compressed air or other compressed gasses, especially oxygen, for dusting or cleaning off their body or clothes.
22. Gasoline, kerosene, or diesel shall not be used for cleaning purposes. Contact your supervisor for an approved safety solvent.
23. Unauthorized tampering with any machinery or equipment is not allowed.
24. Carrying firearms, explosives, or unlawful weapons on company property or in company vehicles is prohibited and grounds for dismissal.
25. Sabotage, theft or willful destruction of company property is grounds for immediate dismissal and prosecution.

26. Horseplay or practical jokes shall not be permitted in company vehicles or on company property before, during or after work hours. Fighting on the job is grounds for dismissal.
27. The use, abuse, transportation, concealment, sale or dispensation of illegal, unauthorized drugs (including detectable amounts in employees' system while working) on company property, job-sites or work areas shall be grounds for The use of alcoholic beverages during work on company property, job-sites or work areas is prohibited and can be grounds for dismissal.
28. All workers must follow specific safety rules and regulations prescribed for employee safety in the Occupational Safety and Health Act of 1970 and other applicable federal, state, and local statutes, standards and regulations.
29. Employees shall also be responsible for any specific subsidiary, construction owner, project, office, or department safety rules distributed to them in writing by their supervisor as a condition of employment.

Specific Job Site Rules

1. Wear the proper personal protective equipment for the job and conditions. This includes approved hard hats, eye and face protection, hearing protection, gloves, hard-soled work boots or safety shoes, hi-visibility vests, shirts, or jackets, and comfortable clothes in good repair.
2. Use a safety harness and fall arrest system when there is exposure to a fall of six (6) feet or more.
3. No employee shall be permitted to ride manually propelled scaffolding.
4. All scaffolding must be provided with appropriate decking. Toe boards, mid-rails, and handrails are required on all scaffolds over 10 feet in height.
5. Gasoline shall be stored and transported in labeled, self-closing; safety cans fitted with protective screens in the spout. Engines must be shut off when refueling. No smoking near flammable liquids.
6. Tools shall only be used for the purposes for which they are designed. The employee is responsible for checking the tool's general condition prior to use. All employees owned tools and extension cords must be inspected and approved by the supervisor prior to use.
7. The employee prior to use shall inspect all ladders. No defective ladders shall be used. Straight ladders shall be placed on secure footing at a 4 to 1 pitch (75-degree angle) with at least 3 feet extending above the work surface. The ladder shall also be tied off at the top. Folding ladders shall be used only in the open and locked position and the last step prior to the top shall never be used. Only non-conductive ladders should be used when working on or near electrical equipment.
8. Unless double insulated, all electric power tools and equipment shall be grounded and connected to ground power cords and receptacles. Power extension cords shall be protected from crushing, cuts, and other damage. Ground fault circuit interrupters should be used.
9. Employees shall not operate any machine unless they are trained and authorized to use the equipment. All guards and safety devices must be in place and in operating condition.
10. All compressed gas cylinders shall be chained in an upright position to the wall or other stationary object.
11. Riding on loads, fenders, running boards, sideboards and gates with legs dangling over the sides of trucks will not be tolerated.

12. Do not use power tools and equipment until employees have been properly instructed in safe work methods and become authorized to use them.
13. Be sure that all the guards are in place.
14. Do not remove, displace, damage, or destroy any safety device or safeguard furnished or provided for use on the job, nor interfere with the use thereof.
15. Do not enter an area which has been roped off or barricaded.

S.C. Swiderski, LLC safety rules, regulations and procedures are illustrative and should not be viewed as an exclusive listing to encompass situations not specifically mentioned. Management reserves the right at all times, when circumstances warrant it, to promulgate new rules or modify existing ones in order to ensure a safe, healthy, and productive work environment for all employees, contractors or visitors. In addition, any similar guidelines provided and required by the general contractors, owner or by specifications are to be observed. Any conflict between these guidelines and those of any applicable state regulations will mean that the applicable state regulation will supersede.

Cell Phone/Handheld Device Use Policy

S.C. Swiderski, LLC-provided portable communication devices (PCDs), including cell phones and personal digital assistants, should be used primarily for business purposes. Employees have no reasonable expectation of privacy in regard to the use of such devices, and all use is subject to monitoring, to the maximum extent permitted by applicable law. This includes, as permitted, the right to monitor personal communications as necessary.

Some employees may be authorized to use their own PCD for business purposes. These employees should work with the IT department to configure their PCD for business use. Communications sent via a personal PCD also may subject to monitoring if sent through the Company's networks and the PCD must be provided for inspection and review upon request.

All conversations, text messages and e-mails must be professional. When sending a text message or using a PCD for business purposes, whether it is a Company-provided or personal device, employees must comply with applicable Company guidelines, including policies on sexual harassment, discrimination, conduct, confidentiality, equipment use and operation of vehicles. Using a Company-issued PCD to send or receive personal text messages is prohibited at all times and personal use during working hours should be limited to emergency situations.

If employees who use a personal PCD for business resign or are discharged, they will be required to submit the device to the IT department for resetting on or before their last day of work. At that time, the IT department will reset and remove all information from

the device, including but not limited to, Company information and personal data (such as contacts, e-mails, and photographs). The IT department will make efforts to provide employees with the personal data in another form (e.g., on a disk) to the extent practicable; however, the employee may lose some or all personal data saved on the device.

Employees may not use their personal PCD for business unless they agree to submit the device to the IT department on or before their last day of work for resetting and removal of Company information. This is the only way currently possible to ensure that all Company information is removed from the device at the time of termination. The removal of Company information is crucial to ensure compliance with the Company's confidential and proprietary information policies and objectives.

When employees are absent from work for a significant period of time or travel outside the geographical area, Company PCD should be forwarded to another company phone number to assure all business phone calls are addressed promptly and efficiently.

Please note that whether employees use their personal PCD or a Company-issued device, the Company's electronic communications policies, including but not limited to, proper use of communications and computer systems, remain in effect.

Portable Communication Device Use While Driving

Employees who drive on Company business must abide by all state or local laws prohibiting or limiting PCD (cell phone or personal digital assistant) use while driving. Further, even if usage is permitted, employees may choose to refrain from using any PCD while driving. "Use" includes, but is not limited to, talking or listening to another person or sending an electronic or text message via the PCD.

Regardless of the circumstances, including slow or stopped traffic, if any use is permitted while driving, employees should proceed to a safe location off the road and safely stop the vehicle before placing or accepting a call. If acceptance of a call is absolutely necessary while driving, and permitted by law, employees must use a hands-free option and advise the caller that they are unable to speak at that time and will return the call shortly.

Under no circumstances should employees feel that they need to place themselves at risk to fulfill business needs.

Since this policy does not require any employee to use a cell phone while driving, employees who are charged with traffic violations resulting from the use of their PCDs while driving will be solely responsible for all liabilities that result from such actions.

Texting and e-mailing while driving is prohibited in all circumstances.

State law bans texting while driving.

Texting with a cell phone while driving recently has become a more prevalent and dangerous form of distracted driving because it diverts a driver's eyes, hands, and mind - for a significant amount of time - from the safe operation of the vehicle.

Wisconsin state law now forbids driving "any motor vehicle while composing or sending an electronic text message or an electronic mail message." Wisconsin's texting ban is a primary enforcement law, which means law enforcement officers may stop motorists suspected of this offense alone.

- Text messaging outlawed for all drivers. Fines from $20 to $400 with a possible 4 points against the driver's license.
- The state outlaws distracted driving, or "being so engaged or occupied as to interfere with the safe driving of that vehicle." The fine is $173 and 4 points.

For these reasons, drivers may not use handheld devices to place work-related calls or while operating a vehicle while on company business. Using a "hands free" device is acceptable if the driver doesn't use his or her hands other than to activate or deactivate features or functions of the device.

This cell phone/handheld device use policy is a guideline to reduce the likelihood of motor vehicle accidents. It may not prevent all motor vehicle accidents from occurring.

Pandemic Procedures

Purpose

S.C. Swiderski and its Affiliates is committed to providing a safe and healthy workplace for all our employees. SCS has developed the following Pandemic plan, which includes procedures to minimize the risk of transmission of widespread disease due to circumstances related to a pandemic.

Policy

SCS's goal is to prevent the transmission of disease in the workplace(s). Managers as well as non-managerial employees and their representatives are all responsible for supporting, complying with, and providing recommendations to further improve this Pandemic plan.

The Pandemic Safety Team, listed below, implements, and monitors this Pandemic plan. The Pandemic Safety Team has SCS's full support in implementing and monitoring this Pandemic plan and has authority to ensure compliance with all aspects of this plan.

SCS and the Pandemic team will work cooperatively with non-managerial employees and their representatives to conduct a workplace-specific hazard assessment and in the development, implementation, and updating of this Pandemic plan.

The Pandemic Safety Team consists of:

- Corporate Safety & Compliance Manager
- Corporate Human Resources

SCS is committed to following the guidelines enacted by the Local Health Agency in the jurisdiction of the respective sites in which employees of SCS are actively working.

Revision #4
Created 2024-05-23 10:24:27 UTC by Dale Bergman
Updated 2026-04-30 16:04:36 UTC by Marc Bouwer