CORPORATE SAFETY POLICY

It is the intent of TRAMMELL CROW RESIDENTIAL ("TRAMMELL CROW") as the General Contractor / Construction Manager to provide a safe and healthy working environment for all employees and project personnel. TRAMMELL CROW considers accident prevention to be of paramount importance in its daily operations. Accidents which result in personal injury and damage to property or equipment represent needless waste and loss.

It is TRAMMELL CROW's policy that all functions and operations will be performed in the safest manner possible, consistent with good construction, environmental, health and safety practices. To fulfill the requirements of this policy, this program must be carried out by all contractors, subcontractors and employees.

The effectiveness of this safety program is highly dependent upon the commitment of contractor supervision, as well as the participation and cooperation of the craftsmen. Supervisors shall insist that all employees and subcontractors observe and obey every rule, regulation, and best management practice to conduct work safely, and shall take all action necessary to obtain compliance.

I, ______, state that the primary objective of this program is to ensure effective control in the prevention of accidents, which is essential for the protection of the company's greatest assets – ITS PEOPLE. Accordingly, our beliefs in a strong safety culture and the prevention of accidents are of the highest importance. Safety of all workers has always had and will continue to have precedence over any and all production demands. TRAMMELL CROW has built a strong reputation for providing high-quality, safe workmanship. Because of this, shortcuts that compromise safety, production and/or quality shall not be tolerated or allowed.

Signature: _____

Date: _____



A) PROGRAM OBJECTIVE AND GOALS

The most important component of a safety program is clearly written safety objectives and goals. In this regard, the following objectives and goals have been established to ensure the effectiveness of the overall safety program.

1) Objectives:

- a) Provide a commitment from leadership that safety is a core value of the organization and will be given equal consideration in all business decisions;
- b) Establish procedures to hold all employees accountable for their safety performance just as they are for other assigned responsibilities;
- c) Establish uniform procedures for pre-construction safety planning;
- Provide a line of communication throughout the organization with regard to safety issues including decisions related to hazard control, accident investigations, inspections, and all other site safety activities;
- e) Establish uniform safety training requirements to enable employees to make appropriate decisions pertaining to regulatory requirements, company policy, and practical safety issues;
- f) Establish a uniform new employee orientation program for all company employees, as well as site-specific orientation programs for subcontractors;
- g) Establish procedures to ensure frequent and regular safety inspections as well as abatement assurance;
- h) Establish accident / incident / near miss reporting and investigation procedures in which root causes are determined and corrective action is taken to prevent future losses; and
- i) Establish procedures by which safety policies are reviewed for effectiveness, compliance, and practicality.

2) Goals:

- a) Establish a "Zero Accident" culture throughout the organization;
- b) Provide for full participation in the safety process from all levels of the organization; and
- c) Prevent occupational injuries and illnesses by eliminating or significantly reducing hazards at every opportunity.



B) <u>RESPONSIBILITES</u>

In order for any business program to be effective, responsibilities and accountability must be incorporated and clearly understood. We have structured this safety program accordingly and assigned responsibility and accountability into the various positions.

- Company CEO / President: Organizational values, goals, and objectives stem from, and are promoted, supported, nurtured, and ultimately enforced through, these leadership positions. The company CEO / President sets the tone and standards by which all subordinates operate. The primary responsibilities of the company CEO / President under this program are:
 - a) Promote safety performance, at every opportunity, as a core value of the organization, equal to all other business considerations;
 - b) Ensure that resources are made available to support the safety performance of the organization;
 - c) Review and approve policies, procedures, and practices necessary to ensure the safety performance of the organization; and
 - d) Hold all subordinate positions accountable for their performance under this program.
- 2) Company Vice President: The company Vice President leads the "projects" aspects of the organization, and as such, must also promote, support, nurture, and enforce all aspects of the safety program. He/she must ensure that safety is instilled as an organizational value through his/her communications and actions. The company Vice President is accountable to the company President. His/her primary responsibilities under this program are:
 - a) Promote safety performance, at every opportunity, as a core value of the organization, equal to all other business considerations;
 - b) Ensure resources are made available to support safety at the project level;
 - c) Consult with the Safety Director on matters of policies, procedures, and practices; and
 - d) Hold all subordinate positions accountable for their performance under this program.
- **3) Company Safety Director:** This position is the catalyst of the safety program. He/she develops, implements, monitors, and reviews the effectiveness of the company safety program. The company Safety Director is directly accountable to the company President. His/her primary responsibilities under this program are:
 - a) Promote safety performance, at every opportunity, as a core value of the organization, equal to all other business considerations;
 - b) Develop, implement, monitor, and review company safety programs, and submit such to the President for review and approval;
 - c) Be familiar with and receive training on current federal and state OSHA regulations and owner requirements as necessary to provide assistance to each job site and work area;

- d) Provide safety approval for protective clothing, tools, machinery, and testing equipment. Ensure appropriate maintenance on any testing equipment;
- e) Conduct frequent and regular job site safety audits. Stop work immediately if imminent danger exists;
- Review safety inspections completed by Superintendents, Project Managers, and third-party entities, and follow up on corrective actions;
- g) Participate in any regulatory inspections and review, address, and defend all alleged regulatory violations;
- h) Ensure that all employees receive and maintain safety training appropriate to their job responsibilities;
- Evaluate employee attitudes, opinions, and overall awareness <u>pertaining to this program</u>. Enforce safety program compliance with disciplinary action in accordance with the Disciplinary Policy;
- Assist pre-construction and estimating departments with project pre-qualification packets, client contract reviews, and subcontractor pre-qualification to identify potential risk as well as develop risk mitigation solutions;
- Oversee, monitor, and ensure the completeness and accuracy of accident reports and investigations;
- Coordinate and monitor the medical treatment of injured employees and the return-to-work program Communicate with insurance carriers on all claims and work with the Project Manager in resolving, mitigating, and defending such claims;
- m) Direct and enforce the company's Substance Abuse Policy;
- n) Administer the company's Safety Recognition Program; and
- o) Collect, analyze, and maintain records of safety statistics, and maintain injury/illness/exposure records.
- 4) Estimators: Estimators prepare the budget and conduct the initial planning phases of the projects. They are responsible and held accountable for ensuring that safety is included in this phase. The Estimator is directly accountable to the Vice President, and their primary responsibilities under this program are:
 - a) Ensure that each project is equipped with a sufficient safety budget as to provide the funds for equipment, materials, and personnel to perform the work safely and maintain compliance with company policies as well as regulatory agencies;
 - b) Review with the Safety Director any plans or specifications that may be of special safety concern;
 - c) Communicate owner/client and TRAMMELL CROW safety, health, loss control, and environmental procedures to the project team and subcontractors;

- d) Pre-qualify all subcontractors and vendors in regards to their safety record and required safety programs; and
- e) Assist in the pre-construction conference to ensure that all safety concerns are addressed so that subcontractors clearly understand their safety obligations in regard to the signed contract.
- 5) Project Managers: The Project Manager is the figurehead of the project and must visibly promote, support, nurture, and enforce all aspects of the safety program through his/her actions and words. The Project Manager is ultimately accountable for the safe conduct of operations on his/her respective sites and is directly accountable to the Vice President. The primary responsibilities of the Project Manager under this program include:
 - a) Promote safety performance, at every opportunity, as a core value of the organization, equal to all other business considerations;
 - b) Ensure the adequate and efficient use of resources to support the safety function at his/her respective projects;
 - c) Be familiar with, understand, and enforce the requirements of OSHA regulations and requirements, TRAMMELL CROW company and project-specific safety regulations and requirements, as well as other pertinent and accepted safe work practices;
 - d) Conduct a pre-construction conference with the owner, architect, and/or subcontractors to identify any safety concerns and issues throughout the pre-construction process and provide documentation of such to the site Superintendent and Safety Director;
 - e) Conduct monthly safety inspections and submit the inspections to the company Safety Director. Stop work immediately if imminent danger exists;
 - f) Monitor subcontractors' compliance with the company safety program and initiate correspondence to subcontractors concerning unresolved safety concerns;
 - g) Review results of all job site safety inspection reports and follow up to ensure prompt action has been initiated and completed to correct unsatisfactory conditions and work practices;
 - h) Participate in all accident investigations that involve their respective projects and investigate and assist the Safety Director in the handling of insurance claims on their project; and
 - i) Request OSHA Consultation on each project exceeding 100,000 square feet prior to the commencement of masonry and/or structural steel.
- 6) Superintendent: In a construction management environment, the Superintendent plays a crucial role in the implementation of the safety program. He/she works with the client and subcontractors to plan and progress the work as safely and efficiently as possible. The Superintendent is responsible for planning and coordinating the work so that hazards are identified as early as possible, and that they are abated in a responsible and efficient manner. The Superintendent is accountable for site safety and reports directly to the Project Manager. The primary responsibilities of the Superintendent under this program include:



- a) Promote safety performance, at every opportunity, as a core value of the organization, equal to all other business considerations;
- b) Be familiar with, understand, and enforce the requirements of OSHA regulations and requirements, TRAMMELL CROW company and project-specific safety regulations and requirements, as well as other pertinent and accepted safe work practices;
- c) Be accountable for, and hold employees and subcontractors under his/her charge accountable for, the safe execution of projects;
- d) Obtain a copy of each subcontractor's safety manual, hazard communication program including SDS, OSHA 10-hour cards, and other special programs that may be required by OSHA/ TRAMMELL CROW /owner prior to starting that phase of work;
- e) Be sure all signs are posted and bulletin boards are maintained in a clear and legible condition;
- f) Conduct weekly safety meetings with all TRAMMELL CROW employees and subcontractors under their control. Document these meetings and submit documentation to the Safety Director;
- g) Monitor for and abate all unsafe working conditions immediately upon discovery, and ensure that the situation is resolved appropriately. Stop work immediately if imminent danger exists;
- h) Train employees under their control on the safe and efficient way to perform an assigned task, and procure and maintain all necessary safety equipment needed to perform the work safely;
- i) Forward all worthwhile requests, suggestions, and complaints with regard to safe working conditions to the immediate supervisor or the Safety Director;
- j) Report <u>all</u> safety incidents, including near misses, immediately and complete all necessary forms in accordance with the Accident Investigation Policy;
- Keep accurate records of all safety related incidents, concerns, or requests in his/her daily reports;
- I) Attend all required safety training as mandated by this program and/or instructed by the Safety Director; and
- m) Follow-up on recommendations and abate safety violations that were noted in inspection reports by the Safety Director, insurance company, and/or regulatory agencies.
- 7) All Employees: Each employee is accountable and held responsible for their actions and/or inactions pertaining to safety. All employees are responsible for the following:
 - a) Promote safety performance, at every opportunity, as a core value of the organization, equal to all other business considerations;
 - b) Strict adherence to all regulatory and company policy work rules, regulations, and posted signs, as well as established safe work practices;

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- c) Report any unsafe working conditions at once to the immediate supervisor or Safety Director; Stop work immediately if imminent danger exists;
- d) Report <u>all</u> accidents and "near miss" situations <u>immediately</u> to the immediate supervisor or the Safety Director, and participate in and cooperate with any safety incident investigations;
- e) Report all possible personal injuries during the work shift when the incident occurs;
- f) Attend all required safety training as mandated by this program and/or instructed by the company Safety Director;
- g) Conduct only those tasks in which he/she has received training and fully understand the safety requirements of the task;
- h) Use the required safety equipment and personal protective equipment provided when necessary. Keep all work areas clean and orderly;
- Learn to recognize unsafe conditions and procedures on the job site. If asked to do a task that he/she considers unsafe, one may question the supervisor without fear of reprimand; if still in doubt, contact the Safety Director;
- j) Be familiar with the Emergency Action Plan for your job location and respond accordingly in the case of an emergency; and
- k) Understand that violations of this policy will be cause for immediate disciplinary action, up to and including termination.



C) COMMUNICATION

Without a good system for communicating health and safety information, plans for our injury and illness prevention system would fail. Good communication allows us to stay in touch with the work force, so that we are constantly aware of health and safety needs throughout our operations. If we are communicating properly, our goals and rules are clearly understood and potential hazards are eliminated before they become harmful. With that in mind, we have developed a variety of ways to communicate our safety and health program:

- 1) <u>Open Door Policy:</u> TRAMMELL CROW maintains an open door policy at all levels of the organization so that ideas and concerns flow freely from leadership to employees and vice-versa. It is important for all employees to feel free to bring their safety concerns or suggested safety improvements to any level of management. If any individual feels this method is not receiving the necessary attention, they should speak directly to the Safety Director. Communications regarding safety related issues can always be made without fear of discrimination or retribution. Any employee who initiates a suggestion, points out a hazard, or wishes to voice a concern regarding safety and health will receive a written or verbal response within five (5) working days.
- 2) <u>Policy Changes:</u> Any changes to company safety policies will be communicated to all affected employee via e-mail, memo, or other written communication. In the case of significant changes, training will be provided in a timely manner though conference calls or on-site meetings. Questions pertaining to these changes should be directed to the Safety Director.
- 3) <u>Safety Flashes (Lessons Learned)</u>: We often learn through our mistakes. However, these lessons should be communicated throughout the organization so all can learn and grow through them. Safety flashes will be distributed throughout the organization to facilitate this process. Employees are encouraged to report lessons learned and submit them to the Safety Director for company-wide distribution.



D) **INSPECTIONS**

Documented safety inspections are an important part of a safety program. These inspections often reveal unsafe conditions and unsafe acts that go unnoticed. Furthermore, they are often used as supporting documentation in the legal defense of OSHA violations and insurance claims. For this reason, it is imperative that inspection reports are accurate and that responses to these reports are prompt.

- 1) Daily Inspections: The Superintendent shall conduct daily safety observations and inspections as part of their supervisory duties. The emphasis is on hazard identification and immediate abatement. Superintendents will exercise their responsibility to stop work until all identified hazards are abated. This inspection process is typically not documented, except in the Superintendent's daily report. However the Superintendent will document repeat and imminent danger offenses through the use of the Safety Hazard Notice form.
- 2) Monthly Project Manager Inspections: The Project Manager will conduct monthly job site inspections. These inspections will be documented using the Safety Inspection Checklist and submitted to the Safety Director. All inspection reports must be completed on the job site and should be signed by the Superintendent. The Project Manager shall provide the Superintendent with a copy of each inspection report, and the Superintendent shall verify abatement of each item noted.
- 3) Corporate Safety Audits: In addition to the daily and monthly inspections, the Safety Director will perform periodic safety audits to verify compliance. As a result of each audit, a report will be documented in writing and copies will be distributed to the appropriate parties. Upon receipt of the audit, the job site Superintendent should take action immediately in correcting those items that have not been abated. Once an item has been abated, the Superintendent shall place his or her initials in the appropriate box on the audit report verifying abatement. Once all items have been abated, the Superintendent shall send the report back to the Safety Director to be placed in the job site files.
- 4) Insurance Inspections: The Safety Director will arrange for each project to receive an inspection by the loss control department of the current insurance carrier. Loss control reports generated by these inspections will be treated as corporate safety audits, and all exposures will be abated.
- 5) OSHA Consultation: It is the responsibility of each Project Manager to schedule an OSHA Consultation visit for their projects exceeding 100,000 square feet. The request for consultation shall be made in writing before the commencement of masonry and/or structural steel. The Safety Director shall be copied on all requests for consultation. OSHA Consultation reports generated by these inspections will be treated as corporate safety audits, and all exposures will be abated. To contact the local OSHA Consultation office for your job site, go to:

http://www.osha.gov/dcsp/smallbusiness/consult_directory.html

E) TRAINING

The key to this safety program and accident prevention is the training of each employee. This policy sets forth the minimum training requirements required of employees to enable them to make sound decisions as they pertain to their work scope and environment.

TRAMMELL CROW corporate Safety Director is responsible for overseeing all facets of this program and has full authority to make decisions necessary to ensure it success. He/she will review the program annually for effectiveness and will provide the President with alternative measures in areas of deficit.

1) New Employee Safety Orientation: A New Employee Safety Orientation is a part of the overall orientation program that all new hires must participate in. This orientation is conducted by the Safety Director, or a person appointed by him/her, and shall include the following topics:

Company's Safety Policy Statement	Safety Policy Goals and Objectives
Safety Responsibilities	Accident Reporting Procedures
Substance Abuse Program	Disciplinary Policy
General Safety Rules	Blood-borne Pathogens
Hazard Communication	Fall Protection

Upon completion of this training, the Orientation Sign-Off sheet concerning the policies and programs must be completed and retained on file at the main office.

2) Project Safety Orientation: In addition to the general orientation, all employees assigned to a job site, subcontractors, and visitors will receive a site-specific Project Safety Orientation. This orientation will be conducted by the Superintendent and will include the following:

Location of SDS and First Aid Kit	Emergency Action Plan
Emergency Phone Numbers	Incident Reporting
General Project Safety Rules	Hazards Particular to the Project

- **3) First Aid and CPR Training:** All Superintendents shall be trained in Basic First Aid and Adult CPR that is equivalent with the training prescribed by the American Red Cross or the American Heart Association. New employees that have not acquired this training with previous employers must meet this requirement within three (3) months of their hire date. First aid and CPR training will also be made available to other employees upon request and as required by other sections of this manual (For example Confined Spaces).
- 4) OSHA 10-Hour Construction Outreach Training: All supervisors, including, but not limited to, job site Superintendents, Project Managers, Estimators, and the site Safety Managers, shall complete the OSHA-10 hour Construction Outreach Training. New employees that have not acquired this training with previous employers must meet this requirement within three (3) months of their hire date. Online training for the OSHA 10-hour Construction Outreach Course can be purchased at <u>http://www.coresafety.com/training/training.php</u>.



- **5) Annual Safety Training:** In addition to the OSHA 10-hour Construction Course, TRAMMELL CROW will hold supplemental safety training for all Superintendents and Project Managers as needed. This training may include, but is not limited to, fall protection, trenching and excavation, scaffolding, lock-out/tag-out, PPE, stairways, and ladders.
- 6) Weekly Safety Meetings: TRAMMELL CROW will conduct regularly scheduled Weekly Safety Meetings (Toolbox Talks). The safety meeting topic shall be selected by the Superintendent and shall be relative to the hazards associated with the current project and scope of work. Each attending employee and subcontractor shall sign the safety meeting sheet, and a copy of the safety meeting and sign-in sheet shall be given to the Safety Director.
- 7) Task Specific Training: TRAMMELL CROW shall conduct or provide for task-specific training for employees as required by the applicable OSHA standards and as deemed necessary for the safe conduct of our operations.
- 8) **Recordkeeping:** All training documentation shall include a training attendance roster and a copy of the course curriculum. Training records shall be forwarded to the company Safety Director and will be maintained in the employee's individual training file.

F) JOB HAZARD ANALYSIS

A Job Hazard Analysis (JHA) is a technique that focuses on job tasks as a way to identify hazards before they occur. It focuses on the relationship between the worker, the task, the tools, and the environment. Supervisors can use the findings of a JHA to eliminate and prevent hazards in his/her workplace and as a tool for training new employees in the steps required to perform their jobs safely.

- 1) **Development:** A JHA will be required in the following situations:
 - a) When leadership and/or the project supervision believes the process, task, or procedure indicates a significant potential for injury and/or property damage;
 - b) When the project specifications require such development; or
 - c) As a condition of approval for contractors that do not meet the safety pre-qualification requirements.

The Job Hazard Analysis worksheet should be used to complete the JHA. To complete this form, the following steps should be followed:

- a) List the key steps in the sequence in which they occur.
- b) Determine the hazard(s) for each step.
- c) Apply specific and effective safety measures to eliminate or control the hazard(s).
- d) Be specific in designations of protective devices and equipment.
- e) Include sufficient detail to preclude confusion and misunderstanding.
- f) Make changes as needed; JHAs are living documents.

A JHA may be required initially before the commencement of work, weekly, or daily thereafter.

- 2) Posting: The JHA serves as an operating procedure and must be posted at the project for workers to review. Upon completion of the task or work assignment, the JHA should be filed in the project files.
- **3) Training:** Prior to the work, personnel involved with the operation will be instructed as to the hazards involved and methods required to eliminate or control those hazards in accordance with the JHA.

G) DISCIPLINARY POLICY

TRAMMELL CROW expects its employees to conduct themselves in a manner that is consistent with the objectives of this manual and the organization's values. The integrity of this manual and the safety culture of the organization depend greatly upon each employee's acceptance of individual responsibility. Consequently, the following disciplinary policy has been developed to ensure fair and effective arrangements exist for dealing with disciplinary matters and that, as far as possible, common standards are observed for all employees.

1) Informal Action: Minor faults will be dealt with informally by way of advice, coaching, counseling, or training as appropriate. The employee should be advised clearly of the standard of behavior expected of them and informed that if he/she does not improve, then they will be subject to formal disciplinary action as set out below.

In respect to matters that are more serious than minor breaches of conduct, the alleged conduct will be dealt with formally and as speedily as possible.

- 2) Verbal Warning: When conduct does not meet acceptable standards, the employee will normally be given a verbal warning by the supervisor authorized to do so. A brief note of the verbal warning will be kept on the employee's personal file and will be copied to the employee making it clear that the warning is the first stage of the formal disciplinary process. If no further action is taken against the employee within 24 months the file note will be removed from the individual's file and disregarded for disciplinary purposes.
- **3) Written Warning:** If the offence is of a serious nature, or a further offence occurs while a formal verbal warning is still active, a written warning will be issued to the employee by the appropriate supervisor. The written warning will give details of the non-compliance, the improvement(s) required, and the timescale for improvement, if appropriate. The written warning will warn that further action may result in suspension and/or termination. A copy of the warning will be kept on the individual's personnel file. The warning will be disregarded for disciplinary purposes after 60 months, subject to satisfactory conduct.
- 4) Suspension / Termination: If conduct remains unsatisfactory and the employee still fails to meet the prescribed standards, or in the case of gross misconduct, suspension or termination of employment will normally result. The employee will be given details of the non-compliance.
- 5) Gross Misconduct: Gross misconduct is conduct so serious that it effectively breaches the contract of employment and so justifies TRAMMELL CROW in effecting a summary dismissal without moving through the normal stages of the disciplinary program. TRAMMELL CROW reserves the right to determine what offences constitute gross misconduct and how these offences will be dealt with.

Movement through the stages of the disciplinary procedure will not necessarily be in relation to the same offence. The cumulative progress of the disciplinary process will be determined by the nature and seriousness of the offences. TRAMMELL CROW may take other actions as an alternative or in addition to a disciplinary warning as is considered justified in the circumstances of the case. This may involve the retraining or counseling of employees.



TRAMMELL CROW is committed to providing a safe workplace for all workers. The success of a safe job lies greatly upon the efforts of each contractor on the project. Therefore, each subcontractor shall comply with the rules and regulations as set forth by this manual and all other local, state, and federal laws that may apply.

- **1) Subcontractor Documentation**: Each subcontractor shall provide TRAMMELL CROW with the following before commencing work on a TRAMMELL CROW project.
 - a) A signed subcontract agreement, thus agreeing to all provisions of safety under such agreement;
 - b) An insurance certificate naming TRAMMELL CROW and the owner as additional insured;
 - c) A project or company safety program and SDS for all hazardous material that are expected to be used on the site. All SDS books will be kept in a common place as to serve for quick access in the case of an emergency. A specific project safety plan may be required when the scope of work indicates a significant potential for injury and/or property damage or when required by the owner.
- Additional Requirements: In addition to the documentation requirements above, each subcontractor must agree to:
 - a) Participate in safety orientations and complete the safety orientation documentation;
 - b) Follow all rules set forth by Section II of this manual and any owner or project-specific safety requirements;
 - c) Provide the necessary training to their employees as it pertains to Title 29, Code of Federal Regulations Part 1926 and 1910;
 - Perform periodic safety inspections of the job site to ensure compliance with the job site safety program;
 - e) Attend TRAMMELL CROW's Weekly Safety Toolbox meeting;
 - f) Immediately report ALL accidents and injuries to the TRAMMELL CROW Superintendent and train their employees in the project-specific Emergency Action Plan.





3) Subcontractor Compliance:

- a) Violations by subcontractors and their employees will be documented on a Safety Hazard Notice. The subcontractor must sign this form acknowledging receipt of the notice and return the form within 72 hours documenting abatement of the violation. If a subcontractor refuses to sign the form or does not return the form within the 72 hours noted, they will be in breach of their contract.
- b) TRAMMELL CROW job sites reserve the right to make modifications to the Subcontractor Safety Compliance policy and remove subcontractor employees as it deems necessary for safety violations.



I) **PROJECT START-UP**

The first few days of mobilization and project setup is vital to having a successful project. Project Managers and Superintendents should use these steps in ensuring they have the proper safety tools and equipment on site.

- Required Postings: Job sites shall maintain federal and state OSHA posters and the OSHA 300A form (February 1st April 30th). State posters for Spanish versions are required in: AZ, CA, FL, GA, IA, KY, LA, MN, NC, NY, OR, PA, SC, TN, TX, UT and WA. Posters can be ordered from Compliance Poster Company at 1-800-817-7678 or [www.complianceposter.com].
- 2) Emergency Action Plan: The Superintendent will assign responsibilities and post the Emergency Action Plan (located in the Forms Section of this manual). In addition to the plan, the Superintendent must also post a map showing evacuation areas, emergency phone numbers (located in the Forms Section of this manual), and have an air horn available to alarm workers.
- 3) Safety Equipment: The following safety equipment should be available on each project.
 - a) Personal Protective Equipment: Each project should be appropriately equipped with the proper PPE (For example hard hats, safety vests, safety glasses, and ear plugs) for TRAMMELL CROW employees to perform tasks safely and to distribute to visitors that may want to tour the site. Safety equipment can be purchased from suppliers such as Conney, Grainger, Ram Tool, White Cap, Airgas, Lowe's, or Home Depot.
 - b) First Aid Kit: Each project must be equipped with at least one first aid kit. The kit should be inspected weekly to ensure that expended items are replaced. First aid kits can be purchased from suppliers such as Conney, Grainger, Ram Tool, White Cap, Airgas, Lowe's, or Home Depot.
 - c) *Fire Extinguishers:* In the case of fire, each project must have an adequate number of fire extinguishers. Fire extinguishers are required as follows:
 - One fire extinguisher rated not less than 2A for every 3,000 square feet.
 - One fire extinguisher rated not less than 2A adjacent to the stairway on each floor of a multi-story building.
 - See *Fire Prevention* Section II, Part J of this manual for fire extinguisher requirements regarding fuel storage.
- **4)** Safety Signs and Posters: Signs and posters play an important role in preventing injury and ensuring workers and the public are aware of the potential hazards and risks associated with the project. Signs and posters should be conspicuously posted.
- 5) Toilets and Sanitation: Each project must have one portable toilet per 10 workers serviced once per week or one portable toilet per 20 workers, serviced twice per week. In addition, each project must have potable water or anti-bacterial soap for clean-up and washing.
- 6) Drinking Water: Each project shall have a water cooler and disposable cups for drinking.