

Guidance Document



Safe Production

Managing Subcontractor Safety Performance





Guidance



*** The purpose of this document is to provide internal guidance for CRH operations and is not intended to be shared with subcontractors or others outside of our subcontractor management process. The "Contractor Safety Checklist" is designed to facilitate the conversations with sub-contractors. ***



A message from our senior management......

A fundamental value at all CRH companies is to provide a safe, healthy and clean work environment for our employees and for all of our business partners. Our commitment is to ensure that everyone returns home safely to their families every day. We accomplish this through the execution of three Safety Core Values:

- -Zero Fatalities
- -Zero Incidents
- -An Employee Driven Safety Culture

While we have made great progress instilling these core values across our group, we have not been as successful in establishing these values with our business partners. As a result, in 2010, four of our subcontractor's employees were killed while performing work on our projects. No fatality is acceptable and we are committed to eliminating all fatalities for all employees working for or with us.

In order to achieve zero fatalities with our subcontractors we have created the enclosed "Contractor Safety Checklist" and "Guidelines." These are designed to establish a minimum level of safety with all of our subcontractor partners to include subcontractors on our project sites, outside contractors performing work at our facilities and the hired haulers delivering our product. By working with our partners to confirm and/or enhance their safety culture and practices, we can help them to achieve zero fatalities while reducing and eventually eliminating all minor injuries. As an added benefit, we firmly believe that implementation of our minimum safety standards will improve the overall effectiveness of our business partners and reduce their cost.

Please incorporate the enclosed practices with your business partners as soon as practical in the coming months and ensure that all employees involved with CRH achieve a high level of safety performance with zero-fatalities as a fundamental core value.

As we move forward, we welcome further suggestions and refinements to our program for achieving safety excellence with our business partners.

Thank you for extending our expectations of safe performance to everyone we work with.

Randy Lake, John Keating



The information included in this guidance document can be used as the foundation to a progressive contractor safety management process. This document is aligned with the "Contractor Safety Checklist".

Phase 1- Contractor Pre-Qualification

The appropriate and reasonable inquiries should be made to contractors who are being considered for partnership. In general these areas are:

- 1) An overview of their safety record and work practices; and
- 2) Specific safety practices pertaining to the work to be performed at CRH facilities.
 - Safety Performance Review Safety Pre-Qualification.
 - Experience Modification Rate (EMR) and OSHA/MSHA Logs for last 3 years of performance.

(See Contractor Safety Checklist items 1-2)

Phase 2 - Subcontract/Vendor Agreement Award

The safety expectations/requirements of the local CRH Company should be included as a specific part of any written contract/agreement (See attached addendum 2). In lieu of the attached Safety Addendum the local CRH Company may attach a copy of their safety policy and procedures to the subcontract/agreement. The use of the CRH Subcontract, Vendor Agreement and/or Trucking Agreement, as approved by the CRH Law Group is required.

(See Contractor Safety Checklist item 3.)



Phase 3 - Pre work

Environmental, Health and Safety

Safety information should be provided to the contractor/hauler/vendor <u>prior to</u> their commencement of work on CRH facilities/projects. This ensures a clear consistent message regarding our safety requirements and performance expectations. Example of documents and information may include but is not limited to:

- A copy of the local company Environmental Health & Safety (EHS) handbook or letters and documents outlining CRH safety requirements.
- Safety briefing on CRH expectations and requirements.
- Safety Pre-Bid Safety Pre-construction meeting review site safety awareness Discuss the Completed Contractor Safety Checklist.
- Provide expectations to ensure compliance with the CRH Life Saving Rules (LSR's) and:
 - Specialized Work Requiring PPE Beyond General Site Requirements
 - Environmentally sensitive work such as Asbestos abatement or superfund reclamation

Insurance

CRH requires a written certificate of insurance, naming our CRH Company as an additional insured, on a primary basis, with waiver of subrogation, with minimum limits that are established in the written contract. The insurance shall provide adequate coverage for the risk/exposure from the contractor or work. CRH Law approved Additional Insured and Waiver of Subrogation language should be in place. This information can be found on the CRH Interchange site.

Each CRH operating company should have a process in place to ensure that (1) we are receiving the written contracts timely; (2) the certificates of insurance name us as an additional insured, and the insurance is on a primary basis with waiver of subrogation language and contain the necessary insurance and correct limits; and (4) we have a system which notes when certificates of insurance expire, and what we are doing to obtain an updated certificate before the current one expires.

(See Contractor Safety Checklist items 4-7)



Phase 4 - Contract Implementation

ARRIVAL ON SITE

A "kick-off" safety briefing should be conducted with all contractor personnel when they arrive at the Project/Facility. This on the job briefing should be conducted and documented by CRH site personnel to establish lines of communication and reinforce contractor safe performance expectations. A Risk assessment (TRACK, T5, THINK, SAFE, Pre-shift meeting, etc.) to discuss the day's work activities is one example. Another example could be a checklist designed from the pre-bid conversation. "High Risk" Contractors have more in-depth requirements (addendum 1).



Regular Ongoing Safety Information and Communication with Subcontractor

A systematic approach should be taken to continue the dialogue and education, for both the contractors and our company representatives. Therefore planning specific times and topics to converse with our subcontractors about progress, safety issues, best practices, etc. are very important. Below are examples of successful activities:

- Expectation of Participation in Risk Assessment—TRACK, T5, THINK, SAFE Meetings.
- Expectation of Participation in Toolbox meetings or documentation provided to CRH that subcontractor safety meetings are being conducted.
- Review and explain expectations for the CRH Life Saving Rules (LSR's)
- Share educational materials for CRH LSR's (Audit tools, etc.)
- General Information/Orientation for project or site
- Safe Backing Requirements
- Review of other Safe Production and Target Zero expectations



DURING CONTRACTORS WORK

CRH personnel should provide oversight and periodic inspections of contractor's work. The CRH Life Saving Rules (LSR's) shall be reviewed and reinforced with all contractors. Periodic observations/surveys of safety performance are also strongly encouraged.

(See Contractor Safety Checklist items 8-9)

Phase 5 and 6 - Completion & Acceptance; Review & Celebration

Contractors should be included in "safe completion" celebration activities with recognition in the form of a letter of appreciation to the company or directly with a crew if a project was completed safely and timely. Ultimately this will ensure a good working relationship with the contractor. Cooperation is critical – it is very easy to list standards and demand compliance – we believe safety is everyone's responsibility and a healthy partnership is mutually beneficial.





Phase 1
Contractor Pre-Qualification

Phase 2

Subcontract/
Vendor Agreement
Award

Phase 3

Pre-Work

Contract Implementation

Phase 4

Phase 5

Completion & Acceptance of Work Phase 6

Review & Celebration

Key Issues

- · Work Experience
- Health & Safety Program / Policy Documentation
- · Safety Statistics
- Training
 Documentation
- Legal and Financial Information
- Insurance Limits and Endorsements
- History of Citation and Fines

(See Contractor Safety Checklist items 1-2)

- **Key Issues**
- Define Scope of Work
- Risk assessment of critical tasks
- Identify contractors capability based on type of work approval
- Contract Definition including General and Specific OH&S Requirements
 Award Contract
- (See Contractor Safety Checklist

item 3)

Key Issues

- Pre-Commencement meeting define requirements and expectations
- Pre-Commencement Risk Controls i.e. permit to work where required, inspection and verification skills and equipment
- (See Contractor Safety Checklist items 4-7)

Key Issues

- Management of contracted work
 - Regular meetings
 - Instruction & Training
- Task Analysis
- Method and Statements
- Determine Level of Potential Risk
- Monitoring & Inspection Auditing
- Periodic
 Performance
 Reviews

(See Contractor Safety Checklist items 8-9)

Key Issues

- Inspection and acceptance of work
- Receive all relevant documents or information
- Confirm no new hazards are created

Key Issues

Evaluate
 Contractors Safety
 & Environmental
 Performance
 determine if they
 would be used
 again retain as an
 "Approved
 Contractor"



Addendum 1 Minimum Requirements for Safety Inductions for High Risk Contractors

1. Minimum Requirements for Safety Inductions for High Risk Contractors

Objectives

- To ensure that a consistent approach to the safety induction of contractors involved in certain activities where there has been a trend of contractor fatal accidents, namely
 - Work involving LOTOTO
 - Haulers/Truck Drivers
 - Paving/Road Surfacing work
- To assist each company in benchmarking against best practice in terms of safety induction.
- To require each company to close out any issues identified in this

gap analysis Points to Note

- A Safety induction is not an isolated or standalone process, it is part of an overall approach for new employees and contractors which is supported by an initial prequalification process, ongoing coaching/monitoring and ongoing safety training and awareness programs e.g. toolbox talks, campaign activities etc.
- Inductions must be site or task specific and must be based around the site and work to be completed. While certain elements of the induction may be generic e.g. advice around manual handling, an induction should always have a significant element of site/task safety related information.
- All inductions must include an assessment. This assessment should be credible in that the questions asked should require site specific or technical knowledge relevant to the site/task.
- Induction can take place remotely through an online program or at the site, once the identification of the person can be verified. Once at the site, the person involved should still receive a brief verbal reminder of the key safety issues e.g. Cardinal Rules, Site Transport Rules.
- Site Inductions are deemed to be effective for 12 months
- While DVDs can be used for Induction material, they must be site specific and cover the key issues outlined below the more site specific material, the more effective is the Safety Induction.



1.1 Minimum requirements for the Safety Induction of Haulers/Truck Drivers

A Safety induction is not an isolated or standalone process, it is part of an overall approach for new employees and contractors which is supported by an initial prequalification process*, ongoing coaching/monitoring and ongoing safety training and awareness programs e.g. toolbox talks, campaign activities etc.

* For this category of contractor, the prequalification process will focus on the contract companies/broker details around vehicle certification, driver permits etc.

	Item to be covered in the Induction	
1	Company Safety expectations on safety and contractor safety.	
2	Site Layout – Loading/Unloading points, one way systems.	
3	Site Speed Limit.	
4	Procedures around loading including the requirement not to leave the truck cab during loading.	
5	Personal Protective Equipment (PPE) requirements.	
6	Site warning system (in the event of blasting) - where applicable.	
7	Safety requirements for delivery to customer sites ¹	
8	General Construction site safety (where deliveries are to construction site safety): • Traffic Control Plan (internal, external). • Using lifting equipment (general precautions in addition to formal certification).	
9	Safe Access to vehicle (for load security, addition of admixtures, adjusting of tanker inlet points).	
10	Safe access to and from vehicle.	
11	Safe cleaning of the vehicle.	
12	Site rules around the issue of ad-hoc maintenance of trucks: • This will cover the rules and restrictions around adhoc truck maintenance such as tyre checking/inflation, battery charging/jump starting. • It should be stated clearly when such activities are not permitted, or that there are supervisory requirements around such work apply to the site.	
13	Product Handling / Load Security basics for precast and paving (where appropriate).	
14	Site Cardinal Rules.	

¹ Some countries have legal requirements / national association level courses for construction materials drivers delivering to construction sites.



1.2 Contractors involved in Paving Operations

A Safety induction is not an isolated or standalone process, it is part of an overall approach for new employees and contractors which is supported by an initial prequalification process*, ongoing coaching/monitoring and ongoing safety training and awareness programs e.g. toolbox talks, campaign activities etc.

* For this category of contractor, the prequalification process will focus on the contract companies' details around previous experience in this type of work and individual worker training details.

	Item to be covered in the Induction	
1	Company Safety expectations on safety and contractor safety.	
2	Personal Protective Equipment requirements.	
3	High Visibility Clothing requirements.	
4	Traffic Control requirements - general precautions.	
5	Traffic Control requirements - for the particular site, including the site specific traffic control plan.	
6	Procedures for reversing.	
7	Emergency procedures.	
8	Working near mobile plant - general precautions.	
9	Working near mobile plant - for the particular site.	
10	Night time work - general precautions.	
11	Night time work - for the particular site.	
12	Procedures for laying out traffic control measures e.g. cones.	
13	Site / Job Cardinal Rules.	
14	Hot material handling - personal protective equipment.	
15	Consequences for not following CRH Safety requirements.	
16	Review of control measures to prevent contact with reversing vehicles at this site/on this job e.g use of bankspersons etc.	
17	Assessment.	•



1.3 Contractors involved in work where LOTOTO is required: Minimum Standards

A Safety induction is not an isolated or standalone process, it is part of an overall approach for new employees and contractors which is supported by an initial prequalification process*, ongoing coaching/monitoring and ongoing safety training and awareness programs e.g. toolbox talks, campaign activities etc.

* For this category of contractor, the prequalification process will focus on the contract company's details around previous experience in this type of work and individual worker training details.

	Item to be covered in the Induction	
1	Company expectations on safety and contractor safety.	
2	LOTOTO procedures at site: • Isolation Owner process. • Group lock out procedures (where applicable). • Try Out / Confirmation step.	
3	LOTOTO change management procedures (when the original task has changed).	
4	 Confirmation that each contractor has been issued or has their own lock (this is the responsibility of the CRH person completing the induction). This element of the induction must include a physical demonstration of the use of a padlock and its correct attachment to an Isolator lock. Where pneumatic or hydraulic isolation is an element of the task involved, then the induction must include a physical demonstration of the use of the locking device e.g. an air valve lock in question and its correct attachment. 	
5	Accident Case Study (Electrical Isolation) - Mountsorrel 2017. This will involve a review of the CRH safety alert for this particular accident.	
6	Accident Case Study (Pneumatic Isolation) - Lemona 2017 .This will involve a review of the CRH safety alert for this particular accident.	
7	Accident Case Study (Electrical Isolation) - Florida 2016. This will involve a review of the CRH safety alert for this particular accident.	
8	Electrical Isolation procedures/requirements at this site - physical demonstration of an air-valve lock (where applicable).	
9	Site / Job Cardinal Rules.	
10	Consequences for not following CRH Safety requirements.	
11	Assessment.	



Addendum 2 Subcontract Contractor Safety Rules

- 1. <u>Safety Representative/Safety Meetings/Self-Inspections</u>. Subcontractor shall designate a competent safety representative and require the safety representative to be on site whenever Subcontractor's employees are on the Project. Contractor shall have the right to reject Subcontractor's safety representative. Subcontractor's safety representative may be required to attend any safety meetings scheduled by the Owner or Contractor. Further, Subcontractor's safety representative shall conduct random safety inspections of the Subcontractor's operations and provide the same to Contractor upon request.
- 2. <u>Safety Program/Contractor Inspections</u>. Subcontractor shall prepare and adhere to a written safety program at all times. In addition, Subcontractor shall comply with Contractor's Safety Program to the extent it imposes more stringent and/or additional requirements. Subcontractor shall cooperate with any inspections that may be conducted by Contractor and take any actions needed to correct, abate, and/or eliminate unsafe conditions.
- **Training.** All Employees and other persons entering the Project under the direction of, or for the benefit, of Subcontractor shall be trained in accordance with all applicable legal requirements for the work to be performed on the Project. In addition, Subcontractor shall conduct at least one safety meeting (e.g., tool box talks) per week with its employees for the purpose of discussing topics relevant to the work being performed on the Project. Subcontractor shall maintain records of all training and provide the same to Contractor upon request.
- **Personal Protective Equipment.** Subcontractor shall require its employees on the Project to utilize personal protective equipment ("PPE") that is of safe design and construction for the work on the Project. Such PPE will comply with all American National Standards Institute ("ANSI") specifications. Subcontractor's employees on the Project shall wear the following PPE at all times: ANSI-compliant hard hats; ANSI-compliant safety vests/apparel; shirts with sleeves; and long pants. All other PPE (*e.g.*, foot protection, hearing protection, respiratory protection, eye and face protection, *etc.*) shall be used as required by applicable regulation or contract.
- 5. **Vehicles/Equipment.** Subcontractor shall comply with all applicable Department of Transportation ("DOT") regulations and ensure that (a) all vehicles and drive-able equipment brought to, and/or used on, the Project by Employees are equipped with working horns, (b) all such vehicles and equipment with an obstructed rear view have working reverse signal alarms (*i.e.*, backup alarms), (c) all alarms are in proper working condition, in use at all times, loud enough to be heard above the surrounding noise level, and in full compliance with all applicable OSHA regulations (e.g., 29 C.F.R. § 1926.601), MSHA regulations (e.g., 30 C.F.R. § 56.14132), and other legal requirements, and (d) all vehicles and drive-able equipment with obstructed rear views are guided by an "observer" (*i.e.*, a backer) whenever backing toward any type of material transfer vehicle such as an asphalt paver, shuttle buggy, milling machine, shoulder widener. *etc.*
- **Transportation.** No person may be transported in any vehicle or equipment unless such person is seated in a seat that is firmly secured and such person is wearing a seatbelt meeting all applicable safety standards (e.g., Federal Motor Vehicle Safety Standards and Regulations). No one is allowed to ride in vehicles (e.g., the backs or sides of trucks) or on pieces of equipment (e.g., loader buckets, trailers, etc.) that are not equipped with seats designed to safely accommodate the number of passengers riding therein.
- 7. <u>Traffic Control.</u> Subcontractor shall comply with all applicable laws, regulations, and project specifications governing traffic control, including any applicable specifications contained in the Manual on Uniform Traffic Control Devices ("MUTCD"). In the event that Subcontractor's work places them in a position with the potential to affect traffic, or if the Subcontractor's work affects the placement or visibility of traffic control warning signs, barricades or other devices or any other part of the traffic control plan for the project, Subcontractor shall notify, plan and coordinate said



work with the person responsible for Traffic Control on the project.

- **8. Language.** Subcontractor shall ensure that English-speaking Employees who are capable of providing fluent translation are present at all times in which non-English-speaking Employees are present.
- 9. <u>Governmental Inspections/Investigations</u>. Subcontractor shall notify the PM and/or EHS Manager as soon as possible of all inspections and/or investigations involving the Work and/or the Project that are conducted by, or on behalf of, governmental authorities. Such inspections and/or investigations include, without limitation, the following authorities: Occupational Safety & Health Administration ("OSHA"), Mine Safety & Health Administration ("MSHA"), DOT, law enforcement authorities, environmental authorities, etc. Subcontractor will report to the PM and/or EHS Manager and keep them promptly apprised of all developments in such inspections and/or investigations, including, without limitation: issuance of warnings, citations, notices of violation, subpoenas, warrants, injunctions, administrative orders, court orders, abatement measures, contests, settlements, litigation, etc.
- **Competent Person.** Subcontractor will ensure that there is a Competent Person (as defined by applicable OSHA/MSHA standards) present at all times for all parts of the Work legally requiring the presence of a Competent Person (*e.g.*, trenching and excavation, fall protection, scaffolding, *etc.*). Subcontractor will designate such Competent Person to Contractor. Contractor may reject the Competent Person chosen by Subcontractor.
- 11. <u>Substance Abuse Program.</u> Subcontractor shall be governed by a written substance abuse program that includes pre-hire drug and alcohol testing, post-accident drug and alcohol testing, random drug testing, and reasonable suspicion drug and alcohol testing in compliance with all applicable laws. All Employees testing positive for drugs and/or alcohol will be prohibited from working on or in connection with the Project.
- 12. <u>Incident Reporting.</u> Subcontractor shall notify Contractor's Project Manager ("PM") and/or EHS Manager of all safety-related incidents involving: (a) Subcontractor and/or its employees and (b) the Work and/or the Project. Subcontractor shall promptly and thoroughly respond to, and investigate, all safety-related incidents and complaints. Further, Subcontractor shall report to the PM and/or EHS Manager as often as directed on the status of such responsive/investigative efforts.

IMPORTANT, PLEASE READ: THESE SAFETY RULES ARE IN NO WAY INTENTED TO CONSTITUTE AN EXHAUSTIVE LIST, OR EVEN A SUMMARY, OF SUBCONTRACTOR'S LEGAL AND CONTRACTUAL RESPONSIBILITIES. SUBCONTRACTOR SHALL OBTAIN AND STRICTLY COMPLY WITH ALL LEGAL AND CONTRACTUAL REQUIREMENTS GOVERNING ITS WORK.



This form should be completed by the Estimator/Project Manager or Supervisor of the CRH Company or one of its subsidiary companies in conjunction with the Contractor involved. Any Safety issues arising from the activities of the Contractor, such as failure to wear agreed PPE, should be immediately addressed, noted and a copy of such notes should be issued to the Contractor involved.

Contractor Safety Checklist

Date:	Location:
Contractor Name:	
Nature of Work:	
Contractors Designated person in	charge of site:
Annual Review 🗌	Project Specific

NOTE:

- All Contractor Employees, regardless of job activity, must be over the age of 18. Contractors involved directly in Quarry Activity must be properly trained and have documentation of that training. Written details of training/experience must be provided.
- All Contractors/ Sub -Contractors must complete a Company Safety Orientation, to cover the CRH Life Saving Rules (LSR's) and relevant safety policies.



1. OSHA, MSHA or DOT Reportable Accidents or Fatalities

	de details of OSHA, MSHA or DOT reportable accidents or fatalities, involving occurred over the last five years.	g your fir	m, which	h
Pleas	e provide the following documents:			
	☐ MSHA Injury Reports (if applicable)☐ OSHA 300 Logs☐ Three (3) years of Experience Modification Rates			
2. (OSHA, MSHA, EPA Citations or Notices			
	e provide a brief summary of any citations or notices of violation within the A, MSHA, EPA)	last three	e (3) yea	ırs:
-		YES	NO	
3.	CRH Safety Policy or Contractor Safety Rules (Addendum) have been reviewed:			
4.	CRH Life Saving Rules (LSR's) have been reviewed:			
5.	Contractor/Subcontractor Environmental, Health & Safety (EHS) Manual Provided (manual should address Risk Assessment & Compliance):			
6.	Has a copy of the Contractors Drug/Alcohol Policy been provided? If no, copy must be provided.			
7.	Does the Contractor have a procedure for reporting of all accidents in place? *The location manager must be notified of all accident notifications to OSHA, MSHA, EPA and DOT as required under regulatory obligations. As a general/prime contractor, CRH should be added as a contact.			



8. INSURANCE REQUIREMENTS

Name & Phone of Insurance Agent:		
Please review the attached insurance requirement outline, sample Certificate of Insurance and Endorsements to verify whether or not you meet our insurance requirements. A copy of your Certificate of Insurance with endorsements is required for review.		
We have reviewed the attached documents and we fully meet the CRH insurance requirements. YES NO		
If you checked NO, please indicate from the list below which of the CRH insurance requirements you do NOT meet:	;	
General Liability Limits Per Occurrence and/or Aggregate		
Per Project General Liability Aggregate		
Umbrella / Excess Limits		
Business Auto Liability Limits w/ Any Auto or Combined Owned/Hired/Non-Owned Autos		
30 Day Notice of Cancellation		
Workers Compensation with Employers Liability		
Additional Insured Endorsements		
Waiver of Subrogation Endorsements		
Primary and Non-Contributory Endorsements		

9. PERSONAL PROTECTION EQUIPMENT	
The following are required AT ALL TIMES on site:	Additional PPE requirements: Where required by regulations, laws, or when conditions or tasks that warrant additional PPE
Hard Hats High Visibility Clothing Safety Footwear Eye Protection	Hearing Protection Hearing Protection Protective Gloves Additional PE:



A Safety Manual from the following CRH Location:	
Has been issued to me on the following date:	//

The following information has been reviewed with me by the CRH Estimator /Project Manager/ Supervisor:

		Initial
1.	All persons employed by me at the CRH site will be made aware of the contents of the	
	CRH location Safety Statement and will complete a safety briefing before	
	commencement of work.	
2.	All persons employed by me will be adequately trained, either by relevant experience or	
	by qualification. Written details of training /experience/ qualification records will be	
	provided upon request. All such persons will be over the age of 18.	
3.	Where an operation is undertaken which differs from the terms of the contract, the	
	operating procedure to be used will be brought to the attention of the Supervisor.	
4.	All machinery used by my employees at the CRH locations will be maintained &	
	operated in accordance with the manufacturers' specification, and where required by	
	law, relevant inspection certificates shall be maintained and made available to the	
	Supervisor.	

I fully understand the safety obligations as detailed above:

Date



Date