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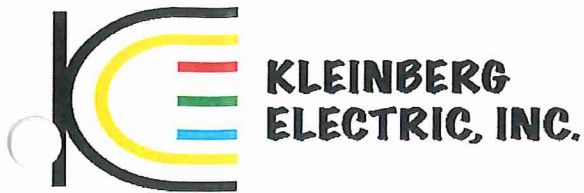
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KLEINBERG ELECTRIC, INC.

SAFETY & HEALTH

PROGRAM

Policy Reviewed on February 28, 2018
By John Vilardi - Superintendent



**Kleinberg Electric, Inc.
Safety and Loss Prevention Program**

Policy Statement

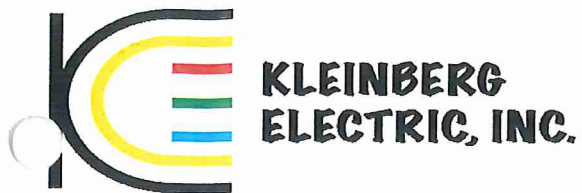
It is the policy of Kleinberg Electric, Inc. to ensure a safe and profitable workplace for all our personnel. To accomplish this policy, we will have an active, progressive, and effective safety and loss prevention program designed to protect all personnel from occupational injury and illness, and equipment from loss or damage. We realize that our most valued asset is our employee and your safety is of utmost importance to our business. In pursuit of this policy, all management and staff will be guided by the following safety and loss prevention program.



Carol Kleinberg – President



Paul Kleinberg – Executive Vice President



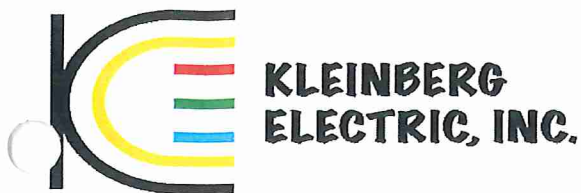
KLEINBERG ELECTRIC SAFETY COMMITTEE

Superintendent /Director	John Vilardi
Exec. V. P. /Project Executive	Paul Kleinberg
Vice Pres. /Management Rep.	Kory Kleinberg

Members of Committee

Marc Cannella	Matthew Friedberg
Gary Haynes	Peter Incantalupo
Mario Martinez	Brian McEntee
Travis Rawlins	Johnny Santana

Committee Meets Every Second Thursday of Every Month at 4:30PM



Goals

The overall goal of our safety and loss prevention program is to prevent on the job injuries and illnesses. Therefore, safety and health will be an integral part of our business philosophy and your daily work performance. To accomplish this, the following goals have been established:

- A. To have all management and staff involved in the development, implementation, and maintenance of our safety and loss prevention program.
- B. The determination for the need of a Health and Safety Committee consisting of both management and staff personnel.
- C. Development of systems and programs that are specifically designed to meet our safety and health needs.
- D. Implementation of an ongoing safety and health training program for management and staff personnel.
- E. Communicate to management and staff their safety and health responsibilities.
- F. To conduct a comprehensive baseline safety and health audit of our jobs.

Objectives

The following are objectives that will be undertaken to achieve health and safety excellence:

NOTE:

In the objectives below, insert realistic completion dates and individuals assigned to Accomplish the task.

- A. The Health and Safety Committee will be established by Paul Kleinberg and will consist of both management and staff personnel.
- B. The Health and Safety Committee will complete the written safety and loss prevention program by Paul Kleinberg and John Vilardi.
- C. A comprehensive safety and health survey of the jobs will be completed by John Vilardi to determine compliance with applicable federal and state safety and health regulations.
- D. The safety and loss prevention program will be communicated to all management and staff personnel by John Vilardi.
- E. A Job Hazard Analysis (JHA) will be conducted for all potentially hazardous work operations and the analysis process will be maintained by John Vilardi.
- F. The safety and loss prevention program will be reviewed at least quarterly by the Health and Safety Committee. The program will be reviewed to ensure its effectiveness and to determine if the desired goals and objectives have been achieved. Changes will be made to the program as needed with approval from Committee by members voting. Two Thirds must be present.
- G. Insure that management and employee personnel know and accept their safety and health responsibilities.
- H. Supervisors will be trained to conduct periodic in-house inspections so they can recognize Potential workplace hazards by John Vilardi.
- I. Supervisors will be trained by John Vilardi so that they will be able to conduct prompt accident/incident investigations.
- J. Initial training for Project Executive and Director will be completed by Walter Brooks or EESISIP
- K. Emergency action procedures will be developed and implemented by the Committee.



Safety and Health Responsibilities

The importance of having all management and employees understand their safety and health responsibilities cannot be overstated. To ensure that you know and understand your role in our safety and loss prevention program, the following responsibilities have been developed for each job description at our company:

A. Executive Vice President

1. Oversees the development, implementation, and maintenance of the safety and loss prevention program.
2. Provides the active leadership and adequate resources necessary to maintain an effective safety and loss prevention program.
3. Develops and assigns safety and health responsibilities to Management Vice President Kory Kleinberg. Who will be responsible to manage project management personnel with regards for their safety and health responsibilities to their respective jobs.
4. Sets a good example by following required safety and health rules and practices.
5. Reviews accident reports.
6. Ensures that a reliable system is in place for employees to report conditions or situations that they believe are potentially hazardous.

B. Superintendent

1. Provides the leadership and positive direction necessary for maintaining the safety and loss Prevention program.
2. Holds all subordinate supervisors accountable for their assigned safety and health Responsibilities.
3. Actively participates in and supports employee participation in the safety and loss prevention Program, and Follows up on recommendations made by supervisors, employees or safety committee.
4. Ensures that Job Hazard Analysis are performed on all potentially hazardous operations.
5. Ensures that employees know about and use the hazard reporting system.
6. Ensures that prompt action is taken whenever hazards are identified or unsafe acts are Observed.
7. Make sure all potentially hazardous tasks are covered by specific rules or procedures to Minimize risk.
8. Provides and ensures that required personnel protective equipment is properly used and Maintained.
9. Ensures that all accidents are promptly reported, thoroughly investigated and properly Documented.
10. Keeps abreast of accident and injury trends that occur.
11. Keeps abreast of federal and state safety and health regulation, applicable to workplace that May affect accidents, illnesses and injuries in the workplace.
12. Make sure that all supervisors and employees receive safety and health training.
13. Helps develop and implement emergency procedures.
14. We will make sure that all supervision on the jobs take all necessary courses given by Local Union No. 3, such as Haz Com, Lock-Out-Tag-Out, Fall Protection, Confined Space, High Voltage Safety, Track Safety etc.

C. Supervisors

1. Set a good example for employees by following required safe work practices and by wearing Personal protective equipment.
2. Supervise and evaluate employees – safety and health performances.
3. Keep knowledgeable and up-to-date on safety and health requirements.
4. Be adequately trained to identify safety and health hazards.
5. Conduct Job Hazard Analysis.
6. Investigate accidents and near-miss incidents to determine their root-cause.
7. Actively discourages all potentially hazardous short cuts undertaken by employees.
8. Consistently and fairly enforce safe work procedures and rules.
9. Provide continuing on-the-job training in safe work procedures and enforce personal Protective equipment use.
10. Make sure each employee knows what to do in the event of an emergency.
11. Ensure that appropriate record-keeping is maintained.
12. Involved in preliminary hazard analysis for new equipment, processes and design changes.

D. Employees

1. Be familiar with the safety and health accident prevention program, to abide by all safety and health rules, work practices, and regulations.
2. Use all required safety devices and personal protective equipment.
3. Perform their work tasks in a safe manner and not to take unsafe short cuts.
4. Conduct daily inspections of their immediate work area to look for unsafe conditions.
5. Report any and all injuries to their supervisor.
6. Know what to do in the event of an emergency

Safety and Health Performance Accountability

As stated in our company policy, safety and health has been given top priority because it is good for business and for the well being of our employees. We expect all employees to participate in our program. In fact your participation in this program is part of your annual performance evaluation. The success of our program is dependent on every individual knowing and practicing their safety and health responsibilities. Management and employees who disregard their safety and health responsibilities will be held accountable as stated as follows:

First Infraction	X	Verbal Warning
	X	Fax to Safety Director
Second Infraction	X	Second Written Warning
	X	Fax to Safety Director
	X	Director talks to individual
Third Infraction	X	Termination by Director with a letter To the Joint Industry Board Employment Department and the Joint Industry Board Safety Director

NOTE: A malicious or extreme safety infraction can result in more severe corrective action including immediate termination with no verbal or written warnings. Any written warning will remain in an individuals' personnel file for one year from the date of occurrence.

Safety and Health Training Program

Training is an essential tool for our entire staff to reduce their risk of experiencing a workplace accident and injury. Managers, supervisors and employees need to be able to recognize, understand and avoid potential hazards to themselves and to their co-workers. The Supervisor is responsible for ensuring that all managers and employees receive the training necessary for them to perform their jobs in a safe and healthful manner. John Vilardi is responsible for determining safety and health training, providing training and assessing the effectiveness of the safety and health training program.

Supervisors will receive the following safety and health training:

1. The goals and objectives of the safety and health program.
2. Their safety and health responsibilities.
3. Detection of hazardous conditions and recognition of unsafe work practices.
4. Accident investigation procedures.
5. Conducting Job Hazard Analysis.
6. Conduct on-the-job safety training.
7. Emergency procedures.
8. Proper use, limitations and maintenance of Personal Protective Equipment
9. Safety and health regulation pertinent to the work operation they supervise.
10. Record keeping requirements.

Employees will receive the following safety and health training prior to performing any work task:

1. Orientation training.
2. Their safety and health responsibilities.
3. Specific On-The-Job training for the job task(s) they perform.
4. Training on the proper use, limitations and maintenance of PERSONAL PROTECTIVE EQUIPMENT.
5. Tool box meetings will be held weekly & records kept by job foreman. Safety job subjects Will be discussed as each session. They will also include subjects such as Haz Com, Lock Out Tag Out, Fall Protection, Confined Space and High Voltage Safety.

Safety and Health Committee (where required)

Kleinberg Electric Inc. has established a committee consisting of management, employees, and the safety coordinator. The committee will assist in the development, implementation, and periodic evaluation of our safety and health activities. Members will be rotated periodically at staggering intervals to allow for maximum involvement and increase safety awareness. Meetings will be held the second Thursday of every month at 4:00pm. All committee members are expected to attend.

The committee will be responsible for the following tasks:

1. Accept committee and voting rules
2. Accept program
3. Review of existing safety and health rules and procedures to ensure that these rules are Current, pertinent, and being followed.
4. Provide suggestions for employee training.
5. Review all accident reports to determine its root cause or trend and make recommendations to Management to reduce frequencies of accidents by type.
6. Audit the results of all safety inspections conducted.
7. Conduct periodic in-house job safety inspections.
8. Provide recommendations to management on safety and health issues.

In-House Safety Inspections Program

Safety inspections are an integral part of our accident prevention program. Inspections will be conducted for the following reasons:

1. Maintaining a safe and healthful workplace.
2. Recognizing unsafe work practices.
3. Identifying unsafe working conditions.
4. Increasing safety awareness.
5. Preventing injuries and illnesses.

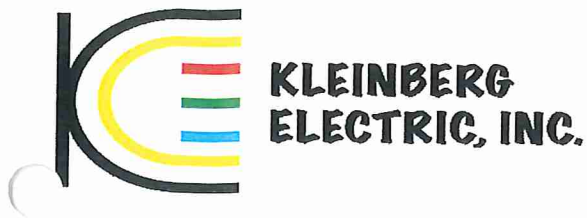
Every individual has some responsibility for conducting safety and health inspections. Supervisors and employees will routinely conduct daily inspections of their immediate work area. Whenever possible, employees will promptly institute appropriate corrective measures. If the condition cannot be immediately corrected, the employee must notify their area supervisor.

If the supervisor cannot immediately correct the hazard, the supervisor will develop an appropriate action plan for the correction of the hazard. Appropriate interim protection measures must be instituted if the hazard cannot be corrected immediately. John Vilardi will be contacted if assistance is needed to determine the appropriate corrective measure and/or interim protection measures or if an employee believes his Supervisor has not acted to correct the hazard. **Under this Safety Program no action will be taken against any employee regarding his/her activism for a safe work place.**

Accident Investigation Program

The vast majority of accidents that occur in the workplace are preventable. Unfortunately, even with the best program accidents may still occur. The steps outlined here are means to ensure that the same type of accident does not occur. Accident investigations are to determine the facts and not to place blame on an individual.

All accidents must be reported to your immediate supervisor promptly. All accidents are to be investigated, even non-injury accidents are to be investigated by the immediate supervisor of the employee involved in the accident. John Vilardi will investigate the following situations should they arise:



1. If the outcome of the accident resulted in a serious injury or the outcome could have resulted in a serious injury.
2. If the accident has occurred previously.
3. If numerous personnel perform the task involved in the accident.

Emergency Action Plans

This section will address our emergency action plans. Emergency action procedures will provide for an effective evacuation of personnel from our facility in the event of an accidental release of hazardous chemicals or gases, fires, explosions, or natural disasters. An emergency action plan has also been developed in the event of a personal injury.

The Safety Committee (SC) and the Director are responsible for the development and evaluation of our emergency action plans. The SC and facility supervisors are responsible for implementation of the procedures.

Emergency evacuation routes and procedures have been posted in each work area of the facility. All new employees will receive initial training during their orientation. It is the responsibility of each Foreman to ensure that each employee under their control is trained and understands the correct procedures to follow in the event of an emergency.

Each supervisor is responsible for ensuring that all employees under their supervision are accounted for after an evacuation. Each employee must report to a predetermined location to verify their evacuation from the facility. The supervisor may perform this verification either personally or by designee. All supervisors will then report the headcount to the Director.

If there is a fatal accident, serious incident or injury the following procedures should be taken:

1. Call 911 immediately.
2. Administer first aid treatment.
3. Call Kleinberg Electric shop @ 212-206-1140.
4. Call Kleinberg Electric's Superintendent @ 917-494-3088
5. Call the Joint Industry Board's Safety Director @ 718-591-2000.

Motor Vehicle Safety Program

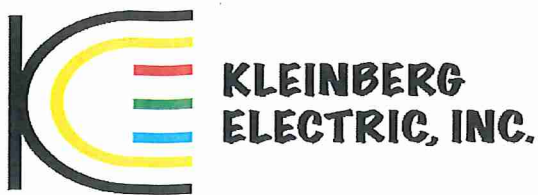
The Director is responsible for the overall Motor Vehicle Program.

The following procedures have been implemented to reduce the risk accidents and injuries while operating a vehicle on company business:

1. Operators must have a valid driver license.
2. Operators must comply with all traffic laws and must be courteous to other drivers.
3. Operators must promptly report any accidents they are involved in, moving violations Received or suspension of license to their supervisor.
4. Operators are required to properly maintain their company vehicles and they shall inspect Their vehicle prior to use.

Our vehicle maintenance procedures are as follows:

- A. Change all fluids.
- B. Check air pressure in tires, brakes, belts.
- C. Make sure State Inspection Sticker is current.



Preventive Maintenance Program

The Director is responsible for the implementation of the preventive maintenance program. Those employees involved in the maintenance program will be given training to allow them to effectively perform their assigned duties. This training will be provided as follows:

The maintenance program will involve the following subjects:

1. Equipment and Machinery
2. Portable Power Tools
3. Housekeeping
4. Means of Egress

Personal Protective Equipment Program

The Director is responsible for the overall implementation of the Personal Protective Equipment Program. The Supervisor(s) will perform a hazard assessment for Personal Protective Equipment needs for each job task in our facility. The employer will verify that a needs assessment has been performed and that training on the use, limitations and required maintenance has been conducted.

Employees are required to wear Personal Protective Equipment for the job task they performed if stated by your supervisor. The Supervisor(s) is responsible to ensure that the Personal Protection Equipment is properly used. Enforcement of these requirements will be consistent with established disciplinary policies. Replacement Personal Protective Equipment can be obtained by contacting your supervisor.

Record-keeping

The following records will be kept by:

**Kleinberg Electric, Inc.
850 3rd Avenue, Suite 405
Brooklyn, NY 11232**

1. Accident Investigation Reports
2. OSHA 300 - Injury and Illness Log
3. Workers Compensation Claims or OSHA 101 Form
4. Safety Training Records

Master copies of the following required written programs will be kept by the Director at 850 3rd Avenue, Suite 405 Brooklyn, NY 11232

Program Evaluation

The Safety Prevention Program will be reviewed by the Committee quarterly. The goals, objectives, and program elements will be evaluated to determine if they are meeting their intended purpose.