



PURPOSE

To set forth a basis for the selection of safe subcontractors and to set forth procedures to assure that the subcontractor's safety activities are equal to or exceed those of Perficut Companies.

POLICY

Subcontractors for Perficut Companies shall be selected and managed in a manner consistent with Perficut Companies safety objectives, policies, and procedures embodied in the other sections of the overall Safety Plan and Manual.

PROCEDURE

Definitions:

Experience Modification Rate (EMR) is a term related to Workers' Compensation insurance and means a factor developed by measuring the difference between an employer's actual past claim experience and the expected or actual experience of the industry classification of the employer. Depending on the workers compensation program in which the subcontractor participates, the EMR may be determined by a single state entity or a multi-state agency such as the National Council on Compensation Insurance (NCCI). The EMR is based on a point scale where 1.0 means average or expected losses for that type of industry classification. EMR's below 1.0 means below average loss history and EMR's above 1.0 mean above-average loss history.

Hours of Exposure means the total number of hours that all of a company's employees are exposed to occupational injuries or illnesses during a normal work year. Salaried and hourly employees are included. Straight-time and over-time hours are included.

Subcontractor for purposes of this section, means a person or business, which has a standard subcontract agreement with Company Associates, as an "independent contractor" (not an employee), to provide some portion of the fieldwork on a project for Perficut Companies.

Requirements:

Subcontractor Selection

It is required that safety performance be considered initially and annually thereafter in the selection of subcontractors using the following criteria:

- Experience Modification Rate (EMR) - Prospective subcontractors shall be required to furnish their EMR for the past three years. This information should come directly from the subcontractor's broker. An EMR greater than 1.0 can indicate an employer with a high frequency and/or severity of workers compensation claims. In the event of an EMR greater than 1.0, a more detailed evaluation of their safety program is required.
- OSHA Log - Prospective subcontractors shall be required to submit copies of OSHA logs (or equivalent summary data) for the previous three years and applicable hours of exposure. Incident frequency and severity rates will be examined and compared for acceptability.
- Subcontractor Safety Program Evaluation - The prospective subcontractor shall demonstrate that his program meets or exceeds industry standards. The following areas are a minimum that shall be addressed by the subcontractor:
 - The program should be industry specific, not generic, and should be responsive to the exposures prevalent in the industry and anticipated on the prospective project.
 - There should be elements of supervisor accountability for safety, accidents, and claim costs Safety meetings should be held regularly, with documentation as to the subject, who attended, and a review of past losses.
 - Safety audits (inspections) should be conducted by the subcontractor on a regular basis. Audit results should be documented to identify deficiencies and corrective action taken
 - The program should provide for employee safety training, including the documentation thereof.



-PERFICUT SITE MANAGEMENT-

Subcontractor Safety Management Plan

1/3/22

- **OSHA Citations** - The prospective subcontractor shall be required to provide information (reason, corrective action, and fines) regarding OSHA citations during the past three years. A history of frequent violations, infrequent but repeated violations, or violations applicable to the work to be performed would warrant further investigation.
- **Pre-Job Planning** - The understanding of Company Associates and the subcontractor on important issues should be written and signed by both parties as part of the subcontract agreement and scope of work. Examples of such issues would be:
 - Tools and equipment used on site and inspection thereof.
 - Performance in accordance with OSHA and other regulatory bodies that apply.
 - Provision of all necessary PPE, training on its use, and enforcement of usage.
 - Responsibility for housekeeping and debris removal.
 - Responsibility for utility locates, maintenance, and protection of traffic and foot travel.

Typical Actions Recommended During Performance of Work - Include subcontractors in the following safety activities:

- Manager Audits.
- Safety Meetings.
- Training Sessions.
- Safety Audits.
- Work Observations.
- Safety Incident Reviews/Investigations.
- Injury Intervention Processes.
- Client-Required Programs.