

BCCI – INJURY & ILLNESS PREVENTION PROGRAM (IIPP)

23 JANUARY 2023

**BCCI Construction, LLC
1160 Battery Street, Suite 250
San Francisco, San Francisco County, CA, 94111
(415) 817-5100**

**BCCI Construction, LLC
150 East Dana Street
Mountain View, Santa Clara County, CA, 94043
(650) 543-8900**

**BCCI Construction, LLC
515 S Flower Street, L19
Los Angeles, Los Angeles County, CA, 90071
(213) 999-3439**

**BCCI Construction, LLC
21084 Bake Parkway, Suite 104
Lake Forest, Orange County, CA, 92630**

The Thinking's Built In

AUTHENTICATION



Approval Authority
Signature: Michael Scribner
Title: Chief Executive Officer
Date: 23 January 2023



Approval Authority
Signature: Matty Kern
Title: Director of Safety
Date: 23 January 2023

NOTE: Authentication occurs upon acceptance and approval of the document's contents by BCCI Construction, LLC authority prior to the issuance of this document in the final format. Authentication is NOT required at any point during the DRAFT stage.

PREFACE

This document establishes the requirements and responsibilities of personnel employed by BCCI Construction, LLC.

This document is an evolutionary document – meaning, as requirements change so shall this document. When a new requirement is implemented or a requirement changes, under delegation from Senior Leaders, the BCCI Director of Safety must review, annotate, and sign the "Record of Changes" indicating this document have been reviewed and accept all changes.

RECORD of CHANGES

<i>A = ADDED</i>	<i>M = MODIFIED</i>	<i>D = DELETED</i>
-------------------------	----------------------------	---------------------------

<i>Change No.</i>	<i>Date</i>	<i>Pg No., Table, Paragraph</i>	<i>A M D</i>	<i>Title or Brief Description of Change</i>	<i>Initials</i>
01	20180601	Entire Document	M	Spelling and Grammar	MSK
02	20190104	Entire Document	M	Spelling and Grammar	MSK
03	20200601	Entire Document	M	Validation & Verification	MSK
04	20210204	Entire Document	M	Spelling, Grammar, Verification	MSK
05	20221001	Entire Document	M	Spelling, Grammar, Verification	MSK
06	20230123	Entire Document	M	Entire Rewrite	MSK

TABLE of CONTENTS

Preface	BCCI Construction, LLC Safety and Health Policy Statement	5
1.0	Assignment of Responsibilities	6
1.1	<i>Program Administrator</i>	7
1.2	<i>Pre-Constructing and Estimating</i>	8
1.3	<i>Project Management</i>	9
1.4	<i>Field Operations</i>	11
1.5	<i>Personnel</i>	13
1.6	<i>Safety Division</i>	14
2.0	Compliance	15
3.0	Communication of Health and Safety Expectations	17
4.0	Hazard Assessments and Inspections	27
5.0	Accident, Incident, or Exposure Investigations	29
6.0	Hazard Abatement	36
7.0	Training and Instruction	38
8.0	Recordkeeping	40
	APPENDICIES	42
	Safety Recognition Program	43
	Safety 360° Program	44
	Code of Safe Work Practices	45
	Safety Committee Requirements	47
	Posting of Notice to Employees	49

PREFACE – BCCI CONSTRUCTION, LLC SAFETY & HEALTH POLICY STATEMENT

BCCI Construction, LLC has developed and implemented a written Injury and Illness Prevention Program (IIPP) in accordance with California Code of Regulations Title 8, Section §3203 as part of our Health and Safety Program. The performed work by BCCI personnel varies both in nature and in location. Employees are faced with all forms of circumstances, and it is the intent of BCCI Construction, LLC to provide a safe and healthful work environment at all locations of our personnel.

BCCI expects and requires all their employees to follow all the requirements set forth in the IIPP and Code of Safe Work Practices (Safety Manual). BCCI continues to focus on safety and our safety culture within every aspect of our operations, including in the provision of a safe and healthful work environment not just our employees, for our sub-contractors, clients, architects, customers, and the public.

All personnel within our company are empowered to be their own safety manager and have the right to refuse or stop any work they believe involves any unnecessary risk, unsafe, or exposes personnel to danger or harm. We understand and believe “SAFETY” is everyone’s responsibility no matter the position held within the company. Employees are to become engaged in our safety programs, which includes the ownership of detection, communications, and mitigation of hazards within the workplace and is a condition of employment. When an event or scenario arises; all personnel have the power to correct the hazard, situation, event, etc. at the lowest level possible; however, if this situation or event is above their capability, capacity, or authority, personnel are required to elevate this to their supervisor or Safety Division for mitigation and correction.

There is a collaborative arrangement amongst leadership, where our program must include positive reinforcement of desired behaviors as well as a consistent discipline program for the undesired actions or behaviors involved at all levels of this organization. We (BCCI); through coaching, mentoring, education, training, Safety 360°, and our excellent safety leadership (e.g., Senior Leaders, Studio Directors, Managers, Superintendents, Supervisors, etc.) and the participation of the entire workforce, BCCI’s commitment, devotion, and professionalism strives us to be a leader of safety within our industry. Only through a cooperative and collaborative effort can we achieve our goal of ensuring all work environments are as safe as possible and free of risk.

Our Injury and Illness Prevention Program are located both physically and virtually at the following locations:

- All Virtual copies are readily available on the Shared Drive and ProCore
- San Francisco Office; 1160 Battery Street, Suite 250, San Francisco, CA, 94111
- Silicon Valley Office; 150 East Dana Street, Mountain View, CA, 94043
- Orange County Office; 21084 Bake Parkway, #104, Lake Forest, CA, 92630
- Los Angeles Office; 515 S Flower Street, L19, Los Angeles, CA, 90071

1.0 ASSIGNMENT OF RESPONSIBILITIES

California Code of Regulations (CCR) Title 8, Section §3203 (a) (1)

BCCI Construction, LLC accepts responsibility for leadership and accountability of compliance for the company's Injury and Illness Prevention Program (IIPP) and the improvement, involvement, and effectiveness; to which aids in the provision of all required safeguards ensuring safe working conditions for all personnel at the office and on the project.

The ultimate responsibility for the BCCI IIPP and Safety Programs rests with all personnel within the company. The primary and alternate Program Administrators are to enact these programs across the company:

Safety Program Administrator: Matty Kernen, Director of Safety
BCCI Construction, LLC, 1160 Battery Street, Suite 250, San Francisco, CA 94111
(415) 264-3840
matty.kernen@bcciconst.com

Alternate Safety Program Administrator: Tony Fisher, Safety Coordinator
BCCI Construction, LLC, 1160 Battery Street, Suite 250, San Francisco, CA 94111
(415) 265-2593
tony.fisher@bcciconst.com

The above listed individuals are responsible for and has the authority of the company's IIPP, which include the overall management, implementation, facilitation, and administration of all safety programs and the coordination of training to all personnel (including New-Hires) on all safety standards, directives, and regulations, are compliant throughout the organization.

The ultimate objective of BCCI is to perform all operations of the organization safely and efficiently, with an established safety culture. To accomplish this, we are ensuring all personnel are empowered while assigning the accountability, responsibility, authority of safety to all management and supervisory personnel within their respective division (e.g., Project Management, Estimating, Field, Operations, Office, Quality Control, etc.)

Ultimately, BCCI personnel are responsible for the conformance and conformity to all aspects of the company IIPP, including all laws, rules, regulations, standards, and directives while practicing, enforcing, and utilizing the Code of Safe Work Practices (Safety Manual) in the performance of their duties. Senior Leaders bear the responsibility for the promotion and funding of the safety program, while recognizing and encouraging all personnel to work in a safe and healthful manner.

1.1 PROGRAM ADMINSTRATOR

California Code of Regulation (CCR) Title 8, Section §3203 (a) (1)

The Safety Program Administrator Responsibilities are as follows:

- Provide advisement and recommendations to Senior Leadership on all Safety & Health Issues related to the company.
- Develop and brainstorm alongside Senior Leadership in the development of all Safety and Health Guidelines and Policies.
- Prepare and distribute the Company Guidelines, Policies, Procedures, Risk Management and Mitigation tools on all Safety and Health issues and concerns.
- Validate and verify all information is current against all Local, County, State, and Federal Safety and Health Regulations.
- Serve as a liaison between Governmental Agencies and the Company.
- Plan, organize, coordinate, and perform all safety training sessions.
- Development and sustainment of the Code of Safe Work Practices (Safety Manual) to include inspection guidelines.
- Establish a Safety & Health Inspection Schedule and conduct follow-up to ensure Recommendations and Corrective Actions are implemented and hazards are abated.
- Implement, Monitor an accident, incident or exposure and near-miss reporting system and perform the appropriate accident, incident, or exposure, & near-miss investigations to determine the causal factors, while providing plausible recommendations to prevent the recurrence of any accident, incident, or exposure and near-miss.
- Coordinate with Structure Tone Building Group (STOBG) Risk Management and Safety Teams on the maintenance of all recordkeeping related to injury and illness reports (OSHA 300 and OSHA 300A Log).
- Review and Establish Trends and share with all operations of the business.
- Establish a system for the implementation and documentation of all records related to inspections, hazard abatement, and training; to include all other required portions of the safety program.

1.2 PRE-CONSTRUCTION AND ESTIMATING

The following responsibilities are applicable to all personnel assigned in Pre-Construction (e.g., Estimators, Managers, and Supervisors) personnel listed in this section. Additionally, personnel must ensure all operations are estimated and performed with the utmost regard for safety and health.

- Ensure they are familiar with the Company IIPP, Code of Safe Work Practices (Safety Manual) and always maintain a current copy of these items in the office or project.
- Ensure workplaces and equipment are safe, well maintained, and in compliance with external agency regulations and BCCI Construction, LLC policies, programs, and practices.
- Ensure all workplace safety and health practices, processes, and procedures are clearly communicated and understood by personnel, trades, clients, architects, and visitors.
- Enforce Health & Safety Policies, Programs, and Procedures fairly and uniformly.
- Evaluate compliance of personnel via no-notice inspections, Code of Safe Work Practices (Safety Manual), IIPP, training, etc.
- Acknowledge and recognize personnel who make a significant contribution to the maintenance and enforcement of the safety policies, procedures, and programs via recognition program.
- Ensure disciplinary action is taken for those individuals who fail to follow the Code of Safe Work Practices (Safety Manual).
- Encourage employees to report workplace hazards immediately and anonymously and without fear of reprisal or coercion.
- The Hazardous Survey Report(s) and Work Plans are required to be in the possession of BCCI Construction, LLC prior to start of any project and the Director of Safety has reviewed these reports and inserted into the Project Health & Safety Plan (HASP).
- Ensure periodic, no-notice, and scheduled workplace safety inspections are performed, and all findings are identified and documented; to include recommendations and corrective actions.
- Ensure all identified findings no matter how minor, are corrected in a timely manner.
- All workplace events (e.g., injuries, exposures, and illnesses) reported immediately, investigated, and recommendations are implemented immediately. (*Refer to Section 5.0 of this IIPP, which references the processes and procedures for reporting serious and non-serious events.*).

1.3 PROJECT MANAGEMENT

The following responsibilities are applicable to personnel assigned to Project Management (e.g., Studio Directors, Project Managers, Assistant Project Managers, Project Engineers, and Supervisors) listed in this section for the overall supervision of the project(s) and those they supervise. Additionally, these employees must ensure all operations are performed / conducted with the utmost regard for safety and health.

- Studio Directors and Project Managers with personnel (Asst Project Managers & Project Engineers) have been implement all Health and Safety Policies, Procedures, and Programs.
- All areas under a Director(s) or Project Manager(s) authority shall have adequate funding for the implementation and facilitation of the Company Safety Policies, Programs, Processes, and Procedures; to include ensured compliance.
- Ensure all personnel are familiar with the Company's IIPP, Code of Safe Work Practices (Safety Manual) and always maintain a current copy of these items in the office or project.
- Ensure the workplace and equipment are safe, well maintained, and in compliance with external agency regulations and BCCI Construction, LLC Policies, Programs, and Practices.
- Ensure all workplace Safety and Health practices and procedures are clearly communicated and understood by personnel, trades, clients, architects, and visitors.
- Enforce Health & Safety Policies, Programs, and Procedures fairly and uniformly.
- Evaluate compliance of personnel via no-notice inspections, Code of Safe Work Practices (Safety Manual), IIPP, training, etc.
- Acknowledge and recognize employees who make a significant contribution to the maintenance and enforcement of the safety policies, procedures, and programs.
- Ensure disciplinary action(s) is administered for any individual(s) who fail to follow the Code of Safe Work Practices (Safety Manual).
- Encourage personnel to report workplace hazards anonymously and without fear of reprisal.
- The Hazardous Survey Report(s) and Work Plans are required to be in the possession of BCCI Construction, LLC prior to start of any project and the Director of Safety has reviewed these reports and inserted into the Project Health & Safety Plan (HASP)
- Ensure periodic, no-notice, and scheduled workplace safety inspections are performed, and all findings are identified and documented; to include recommendations and corrective actions.
- Ensure all identified findings no matter how minor, are corrected in a timely manner.

- All workplace events (e.g., injuries, exposures, and illnesses) reported immediately, investigated, and recommendations are implemented immediately. (Refer to Section 5.0 of this IIPP, which references the processes and procedures for reporting serious and non-serious events.).

1.4 FIELD OPERATIONS

The following personnel (e.g., Senior Director of Field Operations, Field Operations Managers, Senior Superintendents, Superintendents, Quality Control Coordinators, and Labor Foremen) have the overall responsibility for providing a Safe and Healthful work environment and to ensure all operations performed with the utmost regard and respect for safety and health. This also includes all personnel involved in the building of the project to include sub-contractors, clients, architects, visitor, and themselves.

- Ensure they are familiar with the Company's IIPP, Code of Safe Work Practices (Safety Manual) and always maintain a current copy of these items in the office or project.
- Utilize the IIPP, Code of Safe Work Practices, Lessons Learned, and toolbox topics for the current stage of the project at the required weekly safety meetings and ensure all employees are informed and understand the requirements, policies, procedures, and processes of the project.
- Document all meetings, discussions, actions, etc., related to safety for the project; all personnel in attendance must sign-in for each meeting, which shall be maintained and stored in accordance with company recordkeeping policy (Refer to Section 8.0), which is compliant with the State of California Occupational Safety & Health Administration.
- Enforce, coach, and mentor employees on all safety regulations, policies, procedures, processes, and programs in the performance of their duties. The purpose is to establish a positive culture and behavior for compliance, while reinforcing unrivaled participation in the company's safety programs.
- All personnel shall receive a Job Safety Orientation (JSO) and any updated Hazard Communication (HAZCOM) Training prior to starting any work on the project; ensure those individuals who have started without this training or violated these set rules and standard receives immediate remedial training.
- Ensure all workplace safety and health practices and procedures are clearly communicated and understood by personnel, trades, clients, architects, and visitors.
- Enforce Health & Safety Policies, Programs, and Procedures fairly and uniformly.
- Evaluate compliance of personnel via no-notice inspections, Code of Safe Work Practices (Safety Manual), IIPP, training, etc.
- Acknowledge employees who make a significant contribution to the maintenance and enforcement of the safety policies, procedures, and programs.
- Ensure disciplinary action is taken for those individuals who fail to follow the Code of Safe Work Practices.
- Encourage employees to report workplace hazards anonymously and without fear of reprisal.

- The Hazardous Survey Report(s) and Work Plans are required to be in the possession of BCCI Construction, LLC prior to start of any project and the Director of Safety has reviewed these reports and inserted into the Project Health & Safety Plan (HASP)
- Ensure periodic, no-notice, and scheduled workplace safety inspections are performed, and all findings are identified and documented; to include recommendations and corrective actions.
- Ensure all identified findings no matter how minor, are corrected in a timely manner.
- All workplace events (e.g., injuries, exposures, and illnesses) reported immediately, investigated, and recommendations are implemented immediately. (Refer to Section 5.0 of this IIPP, which references the processes and procedures for reporting serious and non-serious events.).

1.5 PERSONNEL

All personnel of BCCI Construction, LLC regardless of their position and duty title are responsible for following the requirements of this Injury & Illness Prevention Program (IIPP). All actions include requirements mention in previous sections and the information listed below:

- Keeping themselves informed of the conditions affecting their Health & Safety.
- Participation in all training programs and sessions as required.
- Adhering to all Safety Policies, Programs, Procedures, Processes, and Code of Safe Work Practices (Safety Manual) as a condition of employment.
- All workplace events are (e.g., injuries, exposures, and illnesses) reported immediately to the program administrator for investigations and recommendations are applied immediately. Refer to Section 6.0 of IIPP, which references the processes and procedures for reporting serious and non-serious events.
- Acknowledge and recognize employees who make a significant contribution to the maintenance and enforcement of the safety policies, procedures, and programs.
- Ensure disciplinary action is administered for those individuals who fail to follow the Code of Safe Work Practices (Safety Manual).
- Encourage employees to report workplace hazards anonymously to the program administrator and without fear of reprisal.
- Maintain a positive attitude and behavior towards safety and reinforce the safety culture.
- DO NOT perform any task, work, or use equipment at any project location, which is unsafe or places yourself, co-workers, or other personnel at risk, injury, or unsafe conditions always; and
- All Personal Protective Equipment (PPE) (Hard Hat, Reflective Vest, High Visibility Clothing, Work Boots, Safety Glasses, and Task Specific Required are worn as required by this IIPP and Code of Safe Work Practices (Safety Manual).

1.6 SAFETY DIVISION

The BCCI Construction, LLC Safety Division is responsible for the development, facilitation, implementation, and management of the Company's Injury & Illness Prevention Program (IIPP) and all Safety Programs.

This involves:

- Schedule and provide education, coaching, mentoring, training, expertise, and technical assistance to Senior Leaders, Studio Directors, Project Management, Field Operations Managers, Supervisors, etc., on the implementation and enactment of the IIPP.
- Assisting personnel in conducting workplace inspections, identification of hazards, reporting processes, hazard abatement, evaluation of tasks, etc.
- Review and update all safety programs, training processes, standards, and regulations ensuring the IIPP, Code of Safe Work Practices (Safety Manual), Training Programs are current.
- Perform investigations into mishaps, near-misses, complaints; and develop written reports with plausible recommendations to correct identified issues or concerns; to include assisting personnel with determining risk management decision; and
- Evaluate the adequacy, effectiveness, and consistency of all training programs designed for validity.

2.0 COMPLIANCE

California Code of Regulations (CCR) Title 8, Section §3203 (a) (2)

BCCI Construction, LLC shall ensure all employees comply with the Health & Safety work practices. Upon request or when needed; personnel will be provided with any additional training and education or remedial training to maintain their knowledge and skills. Our disciplinary policy outlined in the IIPP encourages employee compliance with our safety programs, policies, and procedures.

BCCI is of the understanding our program must include positive reinforcement of desired behaviors; to include a consistent discipline process for undesired actions and behaviors at all levels of the organization. With our Safety 360 ° Program and unwavering safety leadership, we are committed to be the safety leader within our industry, through a collaborative and collective effort, which can achieve our goal of providing a safe and healthful work environment for all personnel.

During displays of observed exemplary safety performance, personnel shall complete the Safety Recognition Form and submit to the Safety Division for recognition or contributions to the BCCI Safety Programs.

EMPLOYEE DISCIPLINARY PROCEDURES

Any employee who fails to comply with any elements of our IIPP, Code of Safe Work Practices (Safety Manual), rules, policies, procedures, directives, etc., shall be disciplined, which may lead to termination depending on the violation. Whenever an employee receives discipline, immediate documentation of the offense must occur by the supervisor or program administrator. Notification of the violation is required to the employee's supervisory chain of command and the Safety Division. An important note involving the disciplinary procedures, ensure all procedures applied consistently, fairly, and without prejudice.

- Step 1 (Written Warning) – Offense must be documented and placed in the Employees Personnel File.
- Step 2 (Written Warning & Suspension) – Document and outline the nature of the violation to include the necessary corrective action, followed by a 1-week suspension at a minimum.
- Step 3 (Suspension without Pay or Termination) – After two (2) Written Warnings or an entirely separate disciplinary action resulting from a serious safety or other violation.
- Step 4 (Termination) – Specific Cause and documentation must be proven between the supervisor and employee, as outlined to terminate an employee.

ZERO TOLERANCE

BCCI Construction, LLC has a ZERO tolerance policy and a list of terms, items, and programs, which may result into an immediate termination phase of discipline. The following violations may be grounds for immediate termination:

- Drugs or Alcohol on the Jobsite; Arriving or Working while Drunk or Impaired on Duty.
- Any Form of Fighting, Threatening, or the Endangering of Others Safety (Workplace Violence).
- Bypass or Removal of Safety Device(s) on tools(s) / equipment (e.g., removal of machine guarding, pinning of saw guards, removal of safety springs on nail guns, etc.)
- Failure to Follow a Life or Death (Fatality) Safety Prevention Program(s):
 - Failure to use Fall Protection or Personal Fall Arrest Systems when required.
 - Failure to Follow Proper Safe-Off (Hazardous Energy) Procedures.
 - Failure to Follow Confined Space Program Procedures when & where required.
 - The removal or Damaging of any Safety Equipment.
 - The Unsafe Operation of a Company Vehicle.
 - Knowingly Violating any Written Rule(s) or Procedure(s).
 - Possessing a Firearm on a BCCI Construction, LLC Premises (office or project).

3.0 COMMUNICATION

California Code of Regulations (CCR), Title 8, Section §3203 (a) (3)

BCCI Construction, LLC shall communicate with employees in a format readily understandable by all affected personnel on matters related to Occupational Safety and Health, including provisions designed to encourage employees to inform their personnel of hazards at the workplace without fear of reprisal.

We recognize open two-way communication between Senior Leaders and employees on safety and health issues is essential for the provision of a safe and healthful work environment. Communication is a major foundation of any safety program and designed to facilitate continuous flow between Senior Leaders and personnel.

All Newly Hired Personnel of BCCI Construction, LLC, undergo a 4-day New Hire Orientation, which safety is a major contributor. During this Orientation, new personnel receive training for the IIPP, Code of Safe Work Practices, Safety 360°, Hazard Communication, and all Company Safety Policies and Procedures. Additionally, safety validates and verifies any OSHA 10 or 30 in Construction and First Aid / CPR / AED training received by the new employee and determines if recertification is required. Personnel assigned to a project receive additional safety training through the Job-Safety Orientation (JSO).

Open (verbal & written) communication is highly encouraged as related to any safety and health issues, concerns, or comments. Any employee may report an unsafe condition, process, or procedure, which poses a level of risk to the safety and health of any BCCI personnel, sub-contractor, client, architect, visitor, or the public without fear of reprisal. Any communication or complaints will be given to the Safety Division:

Matty Kernen, Director of Safety
BCCI Construction, LLC, 1160 Battery Street, Suite 250, San Francisco, CA 94111
(415) 264-3840 matty.kernen@bcciconst.com

Tony Fisher, Safety Coordinator
BCCI Construction, LLC, 1160 Battery Street, Suite 250, San Francisco, CA 94111
(415) 265.2593 tony.fisher@bcciconst.com

If an employee is reporting a safety violation and requests to remain anonymous, they have the right to have their identity protected and may submit their comments, concerns, or complaints directly to the BCCI Construction, LLC Director of Safety.

There are various communication systems used by BCCI Construction, LLC to relay information to their personnel on matters of Occupational Safety and Health, Company Programs, Policies, Processes, Procedural changes include:

- Lessons Learned.
- Posting of Notice to Employees
- Employee Training
- Weekly Project Safety Meetings

- Electronic Mail (e-Mail)
- Virtual Meeting (Microsoft Teams)
- Anonymous submission of Hazards or Safety Violations
- Anti – Reprisal Policy
- Trends determined through inspections and communication
- Safety Committee Team

Several of these items are further explained below:

SAFETY COMMITTEE MEETINGS

In Accordance with California Code of Regulations (CCR), Title 8, Section §3203 (c) (1) authorizes BCCI Construction, LLC to use a labor / management Safety and Health Committee to comply with the communication requirements of sub-section (a) (3) of Title 8. The Safety Committee currently meets monthly and is chaired by the Chief Operations Officer and Director of Safety. The composition of the Safety Committee is a mixture of personnel from all divisions and locations of the company (e.g., Project Management, Pre-Construction, Field Operations, Personnel, Laborer Force, and Safety Division).

During the meeting reported mishaps, inspection findings, safety culture, established safety goals, and safety education / training are reviewed and discussed to develop trends and identify any high-interest items, which require inspection and evaluation on a regular basis. Policy and Procedural changes are brought to this committee for consideration, review, and discussion prior to presenting to Senior Leader for approval of change and implementation.

POSTING OF NOTICE TO EMPLOYEES

BCCI Construction, LLC complies with the California Code of Regulations (CCR); Title 8; Section §9881 for Posting of Notices to Employees are displayed in areas where personnel gather (e.g., trailers, common areas, gang boxes, copier rooms, break room, etc.) Notices are utilized to provide additional information to personnel with relation to Company Safety matters, as needed.

The Required Posters and Notices listed below:

- California Labor Law Poster (State, Federal, County, and City)
- Safety and Health Protection on the Job (Cal-OSHA)
- Access to Medical and Exposure Records
- Whistleblower Protection
- Other Safety and Health Guidance (Code of Safe Work Practices and Pandemic Response, etc.)

TAILGATE / TOOLBOX SAFETY MEETINGS

As required by California Code of Regulations (CCR); Title 8; Section §1509, Toolbox / Tailgate meetings are a 10–15-minute on-the-job meetings for all personnel on the project. These meetings are to assist personnel with situational awareness of the work-related hazards on the project and aid in the prevention of injuries. These meetings must address the specific hazards and safe work practices for the task's personnel are performing on the project. This also addresses health concerns related to the specific work being performed.

The supervisory personnel (e.g., Project Managers, Assistant Project Managers, Safety, Superintendents, Assistant Superintendents, Lead Laborers, and Laborer Foremen) assigned to a project will host a weekly safety meeting with all personnel onsite. The topic of discussion shall be relevant to the operations performed onsite. The supervisory personnel will select the topic of discussion. Every meeting and all personnel are required to sign-in on the roster to ensure accountability; and all documentation will be electronically stored in ProCore. Additionally, all documentation will be retained in accordance with California Code of Regulations (CCR) Title 8; Sections §14300-§14300.48.

SUPERVISORY TRAINING

BCCI Personnel who operate in a supervisory role will be trained to provide guidance and clarification to their personnel assigned to the project with respect to the company's Injury Illness Prevention Program (IIPP), Code of Safe Work Practices (Safety Manual), perform Jobsite Safety Orientation (JSO) and other safety programs personnel will encounter while assigned to the project.

- Superintendents and Assistant Superintendents will receive OSHA-30 Hour in Construction, First Aid-CPR-AED Certifications, and any specialized training in key safety programs as they relate to their project.
- Supervisory personnel receive training to perform inspections of the project and on the documentation process.
- Supervisory personnel receive training to investigate a mishap or near miss properly; to include proper documentation of all related events at the jobsite or workplace.
- Project Managers, Assistance Project Managers, Project Engineers, Lead Laborer, and Labor Foreman will receive instruction OSHA-10 Hour in Construction and any specialized training in key safety programs as they relate to their project.
- Quality Control Coordinators (QCC) will receive OSHA-10 Hour in Construction instruction upon initial assignment into the QCC program and upon completion of this program will, receive instruction in OSHA-30 Hour in Construction, in addition to First Aid, CPR, AED Certification.



SAFETY COMMITTEE CHARTER

Everybody, Everywhere, Everyday

bcci



BCCI CONSTRUCTION
bcciconst.com

WA License No. BCCICCL801QZ
OR License No. 235182
CA License No. 492944

SAN FRANCISCO
1160 Battery Street, Suite 250
San Francisco, California 94111
Main 415.817.5100
Fax 415.995.6026
infosf@bcciconst.com

SILICON VALLEY
150 E Dana Street
Mountain View, California 94041
Main 650.543.8900
Fax 650.543.8939
infosv@bcciconst.com

LOS ANGELES
515 S Flower Street, 18th Floor
Los Angeles, California 90071
Main 213.999.3439
Fax 213.402.6777
infoala@bcciconst.com

SAFETY COMMITTEE CHARTER

MISSION STATEMENT - The mission of the BCCI Safety Committee is to develop and promote a safe and healthful work environment for all employees, subcontractors, and visitors to our projects and offices through the involvement of all individuals with regards to education, training, mentoring, coaching, communication, and safe work practices. We will support and encourage the four pillars of Safety 360°: Awareness, Behavior, Shared Responsibility, and Positivity.

***AWARENESS.** We expect active engagement from all employees in their immediate environment, as well as awareness of what's happening around them. It also means that we look out for one another's physical and mental safety, and that every employee and worker is empowered to speak up.*

***SHARED RESPONSIBILITY.** We believe that the best way to increase awareness and action is to increase responsibility, so our superintendents, project managers and others are as engaged in safety as our dedicated Safety team members.*

***BEHAVIOR.** Behavior is the primary contributing cause of over 80% of accidents. With that in mind, the primary goal of our Safety 360° approach is to avoid risky behaviors altogether. Through behavior-based safety education, we are helping staff take a more active role in supporting a strong safety culture that solicits feedback, engages the workforce, and empowers people to make a difference.*

***POSITIVITY.** Safety 360° relies on positive reinforcement to inspire project teams and employees at all levels to achieve the highest level of safety. Regular feedback, engagement and coaching are at the program's core and drive our efforts to foster a lasting and positive safety culture across the organization.*

MEMBERSHIP AND APPOINTMENT – Committee members shall be voluntary or appointed by the Director of Safety and Executive Sponsor. Members will constitute of a diverse group of employees from all departments and divisions within BCCI.

COMMITMENT – Members shall serve a minimum 2-year term, which is staggered so experienced members are always serving on the committee. A term longer than the two (2) years can be served if all parties (e.g., Director of Safety, Executive Sponsor, and Committee Members) agree. The Director of Safety, Executive Sponsor, and a Legal, Risk, & Compliance representative will be permanent members of the committee. All Members must complete an OSHA-10 training at a minimum.

COMMITTEE REPORTS DIRECTLY TO – Director of Safety and Executive Sponsor.

builders

COMMITTEE MEMBERS ROLES AND RESPONSIBILITIES

- Continued development and implementation of a safety focused cultural shift within the BCCI organization which will positively impact our external partners and clients.
- Conducting health and safety inspections of both project sites and assign personnel for corporate offices, identifying safety hazards, and recommend corrective measures.
- Promoting the awareness of Safety with potential clients, architects, engineers etc.
- Review of accident/incident reports. Type of accidents, root causes, and trends shall be identified, and appropriate corrective actions recommended.
- Assist in the development and implementation of effective health and safety awareness programs.
- Develop and implement a positive safety award and recognition program for our building partners.
- Encourage feedback from all individuals about health and safety related to ideas, problems, and solutions.
- Provide support and serve as a resource in the development, implementation, and maintenance of a comprehensive safety, loss prevention and loss control program.
- Develop written programs to ensure compliance with all applicable OSHA and local health and safety regulations, standards, and directives.
- Serve as an advisory body to management on health and safety issues.
- Hold subcontractors and/or any visitor accountable for wearing PPE.
- Inspire project teams to achieve the highest level of safety.

DEPARTMENTAL ROLES

Marketing is Responsible for the following:

- Creating Safety Materials for implementation, coaching, mentoring, and education.
- Promotion of the Importance of Safety with potential clients, architects, engineers, etc.
- Adherence to BCCI PPE requirements when visiting Project sites.
- Create Social Media and Internal Recognition Programs to support our Safety Culture.
- Recognize Project Teams who “Go Above and Beyond.”

LEGAL, RISK, AND COMPLIANCE is Responsible for the following:

- Ensure Safety language & requirements are current on contract documentation.
- Contribute to new concepts and elements of effective management which mitigates risk.
- Monitor Safety Performance, verify safety program compliance, and identify any shortfalls and opportunities for improvement.
- Confirm BCCI is current on relevant information from our trade associations, Federal, State, and Local jurisdictions.

- Review Client Health & Safety requirements as required (e.g., COVID-19 vaccination requirements, esp. as they relate to disclosure of personal information and privacy concerns).
- Ensure staff are trained in communications protocol to minimize legal risk (e.g., know when to involve Legal and Compliance if regulatory authorities/law enforcement is involved).
- Promoting the significance of safety with potential clients, architects, engineers etc.
- Review and assess documentation relating to injuries, accidents, claims, and workplace violations.
- Adhering to BCCI PPE requirements when visiting project sites.
- Be available as a resource for consultation.

PRE-CONSTRUCTION & ESTIMATING is Responsible for:

- Promoting the importance of Safety with potential clients, architects, engineers etc.
- Adhering to BCCI PPE requirements when visiting project sites.
- Holding subcontractors and/or any visitor accountable for wearing PPE.
- Including adequate safety dollars are included in project budget.
- Ensuring proper job specific safety requirements are included with contract documents.
- Recognize project teams who go above and beyond.

PROJECT MANAGEMENT is Responsible for:

- Promoting the importance of Safety with potential clients, architects, engineers etc.
- Adhering to BCCI PPE requirements when visiting project sites.
- Ensuring proper job specific safety requirements are included with contract documents.
- Review project specific safety requirements at internal kickoff meeting.
- Review project specific safety requirements with Building Engineer/Manager, Client, and Design team members & subcontractors at external kickoff meeting.
- Perform site safety visits throughout duration of project.
- Holding subcontractors and/or any visitor accountable for wearing PPE and developing Pre-Task Plans and Job-Hazard Analysis.
- Recognize project teams who go above and beyond.

FIELD OPERATIONS is Responsible for:

- Promoting the importance of Safety with potential clients, architects, engineers etc.
- Adhering to BCCI PPE requirements when working on project site.
- Review project specific safety requirements at internal kickoff meeting.
- Review project specific safety requirements with Building Engineer/Manager, Client, and Design team members & subcontractors at external kickoff meeting.
- Ensure all visitors sign visitor waiver.
- Keep waivers in jobsite office.
- Provide safety orientation to any visitor to the project site.
- Participate in safety meeting with subcontractors and vendors.
- Perform site safety inspections and interactions throughout the duration of project.
- Hold subcontractors and/or any visitor accountable for wearing PPE.
- Generate Site Logistics Plan and HASP for each project and submit to Safety Director for approval.
- Recognize project teams who go above and beyond.

PRODUCT – Collateral for team and trade recognition.

MEETINGS AND SCHEDULE – One formal meeting per month with bi-monthly meeting while we work to establish a new culture focus on safety. Committee Members will also attend two (2) project site visits per quarter.

PARTICIPANTS

NAME	DEPARTMENT	DIVISION
Daniel Nunez	Preconstruction	Silicon Valley
Dominic Sarica	Executive Sponsor	Corporate
Pablo Aguirre	Field Operations	Silicon Valley
Jim Williamson	Field Operations	Structures
Dallas Jones	Field Operations	San Francisco
Kristopher Angel	Field Operations	San Francisco
Jose Barrera	Field Operations	Silicon Valley
Matt Cabral	Field Operations	Silicon Valley
Matty Kernan	Safety	Corporate
Tony Fisher	Safety	Corporate
Cody Beratlis	Project Management	San Francisco
Matt Olivero	Project Management	San Francisco

Manju Harikrishnan	Project Management	Silicon Valley
Mirna Zappin	Legal, Risk, Compliance	Corporate
Nicholas Brown	Field Operations	Los Angeles
Nicole Bennetta	Marketing	Corporate
Robert Edington	Legal, Risk, Compliance	Corporate
Stephanie Schmitt	Project Management	Structures

RESULT – STRONG SAFETY CULTURE

BCCI is committed to creating a positive safety culture throughout the organization. Our tools aid in the reduction accidents, incidents, injuries, and claims. Through the wear of PPE on our project sites, BCCI will further strengthen our safety awareness while making a true difference to our staff, subcontractor partners, and our clients. The goal is, of course, to save lives and livelihoods.

ACTION ITEM(S)

- Pre-Qualification of Trades
- Recognition of Milestones and Identified Ideas
- Update Safety Moment Schedule and Publish



4.0 HAZARD ASSESSMENT(S) AND INSPECTION(S) ***California Code of Regulations (CCR), Title 8, Section §3203 (a) (4)***

The goal and purpose of the BCCI Injury and Illness Prevention Program (IIPP) is the identification and evaluation of unsafe work procedures, conditions, and practices as to aid the prevention of mishaps, near misses, and job-related illnesses. The objective with hazard assessments and inspections is to eliminate or with hierarchy of controls mitigate risk.

The principal approach to risk mitigation and reduction of mishaps and near misses are with periodic scheduled and no-notice inspections, education and training, and immediate reporting of identified hazards.

All personnel will be responsible for the continuous and on-going inspections of the workplace. When potentially hazardous conditions are discovered, they shall be corrected or mitigated immediately at the lowest level possible. The following identified personnel regardless of the duty title are responsible for the performance and documentation of workplace inspections:

- BCCI Lead-Laborers and Laborer Foreman.
- BCCI Project Managers, Assistant Project Managers, and Project Engineers.
- BCCI Field Operations Managers, Senior Superintendents, and Superintendent.
- BCCI Director of Safety and Safety Coordinator.

INSPECTIONS

An essential part of managing the effectiveness of our safety program is to perform and document project and office inspections. Our inspection program is a positive tool in the elimination of hazards and a communicative catalyst of findings and observations throughout the project, company, sub-contractors, etc., to aid in prevention of recurrence and ensure consistency throughout the company and workforce.

Routine inspection of the project should be performed weekly by the Project Manager, Superintendent, or Labor Foreman to identify, address, correct, or mitigate the identified hazards discovered during this routine inspection. Additionally, these routine inspections identify unsafe conditions, processes, and procedures, which when addressed provide a safe and healthful work environment.

DOCUMENTATION OF INSPECTIONS

All inspections (formal or spot) performed require documentation with all findings, corrective actions, and recommendations. Safety checklists are available electronically through ProCore and utilized to ensure compliance. The above listed personnel will utilize the Safety Checklists to perform their inspections. The following guidelines to document inspection of the workplace or jobsite are as follows:

- Project Personnel will perform Weekly Inspection(s) & annotate in their Daily Logs.
- Project Inspection(s) shall occur prior to the start of the work shift to ensure compliance.

- When a process, procedure, or equipment changes in the work environment.
- Newly Identified hazards due to a process, procedures, & work environment change.

SAFETY AND INTERNAL AUDIT

The Safety Division will assist supervisors in the identification and correction of potential hazards, as they conduct inspections and surveys of the jobsite or workplace by documenting the finding with pictures; then supplies a recommendation to correct the finding and await the corrective action taken to close the report. All completed inspection reports are to be forwarded to the Project Team for immediate action, and when sub-contractors are in violation of compliance; the findings identifying the sub-contractor are forwarded to the specific sub-contractor safety personnel for immediate action and cross-tell. This action is to aid in the unification of Safety at the workplace or project.

OUTSIDE AGENCY INSPECTION(S)

There are outside agencies who conduct regular, periodic inspections throughout all our geographically established projects and offices, which assist in achieving some of our inspectional responsibilities under this IIPP. These agencies include:

- City and County Building Inspectors, Fire Marshal's Office, and Fire Departments
- Federal & State Occupational Safety & Health Administration (OSHA).
- State, County, and Local Department of Public Health & Environmental

RECORDKEEPING OF INSPECTION(S)

The Project Team and Safety Division shall maintain records of scheduled and no-notice safety inspections of unsafe conditions, processes, procedures, and non-compliance for a minimum of two years (unless otherwise specified). These records include:

- The person performing the inspection.
- Any description of the unsafe conditions, processes, procedures, and work practices.
- Documentation is maintained electronically through ProCore and Shared Drive.

5.0 ACCIDENT, INCIDENT, ILLNESS, OR EXPOSURE INVESTIGATIONS

California Code of Regulations (CCR), Title 8, Section §3203 (b) (6)

The “Prompt” reporting of a mishap or near-miss is crucial to the response, investigation, and prevention of future mishaps, near misses, and work-related illnesses. This immediate reporting affords the Safety Division to properly perform a safety investigation to determine the root cause of the event and develop plausible recommendations to prevent the recurrence. There is NO claim, loss, damage, or incident too small where it does NOT warrant reporting. When an employee during the performance of their duties sustains a mishap or illness requiring medical care, the Responsible Person listed below shall conduct a thorough safety investigation:

Matty Kernen, Director of Safety
BCCI Construction, LLC, 1160 Battery Street, Suite 250, San Francisco, CA 94111
(415) 264-3840, matty.kernen@bcciconst.com

Tony Fisher, Safety Coordinator
BCCI Construction, LLC, 1160 Battery Street, Suite 250, San Francisco, CA 94111
(415) 265-2593, tony.fisher@bcciconst.com

SERIOUS INJURIES, ILLNESSES, OR FATALITIES

California Occupational Safety & Health Administration (Cal-OSHA) in accordance with California Code of Regulations; Title 8, Section §330 (h) defines an injury or illness as serious if; *“any injury or illness occurring in a place of employment or in connection with any employment that requires inpatient hospitalization for other than medical observation or diagnostic testing, or in which an employee suffers an amputation, the loss of an eye, or any serious degree of permanent disfigurement, but does not include any injury or illness or death caused by an accident on a public street or highway, unless the accident occurred in a construction zone.”*

All personnel shall follow the following process when notification of mishaps:

- Notify BCCI Director of Safety – (415) 264-3840 to Report Serious Injury, Illness, or Fatality.
- BCCI Director of Safety WILL immediately respond to scene.
- BCCI Director of Safety WILL Notify Cal-OSHA within 8-Hours of the event.
- All other Accidents, Illnesses, Injuries, or Exposures will be handled on a case-by-case basis.

NOTIFICATION PROCESS

All accident, injury, illness, exposure, or near-miss reporting will comply with the BCCI Code of Safe Work Practices (Safety Manual). All reports will include the Mishap / Near-Miss report, Trade Mishap Report, Release back to duty, and any other required Workmen’s Compensation Carrier forms to include Cal-OSHA. (*Refer to Section §32.0 of Code of Safe Work Practices*).

DOCUMENTATION REQUIRED FOR ACCIDENT, INCIDENT, ILLNESS, INJURY, EXPOSURE REPORT(S)

- BCCI Accident, Incident, Injury, Illness, Exposure, Near-Miss Report
- Trade Incident Report (Required)
- Release Back to Duty Documentation (Required)
- Restricted Duty Documentation (Required)
- Any Witness Statements (If Applicable)
- All documentation WILL be submitted as one (1) package within 24-Hours of occurrence to the Safety Division at bccisafety@bcciconst.com .

DOCUMENTATION OF A NEAR-MISS INCIDENT

- BCCI Accident, Incident, Injury, Illness, Exposure, Near-Miss Report.
- Trade Incident Report (Required)
- Any Witness Statements (If Applicable)
- All documentation WILL be submitted as one (1) package within 24-Hours of the occurrence to the Safety Division at bccisafety@bcciconst.com .

ON SCENE PROCEDURES

- STEP 1 - Administer First Aid and seek Medical Attention as soon as possible to the injured person. Protect the injured person from any hazard, which could worsen their condition.

NOTE: If the occurrence in a non-emergency; contact On-Site Health & Safety to provide treatment and assessment.

- STEP 2 - Immediately call “911” when the mishap is of serious nature; then notify Director of Safety, who in turns notifies upper management and Senior Leaders.
- STEP 3 - BCCI Senior Leaders or an authorized representative(s) will be present prior to speaking to anyone if the incident is of a serious nature. Never speak to the media or Non-BCCI Personnel about the incident and refer all questions to BCCI Senior Leaders.
- STEP 4 - Never sign any documentation about the incident and defer all requests to BCCI Senior Leaders or the Emergency Response Team (ERT) or Crisis Management Team.

If you sustain an injury on-duty, you have the responsibility to notify your supervisor immediately prior to seeking medical attention at all possible. It is of utmost importance to report all job-related injuries to you Supervisor and Director of Safety. If you are involved or a witness to an incident, then cooperate with your Supervision of Safety Division and assist with the any requests and determination of the causal factor in the incident. The observations translated or relayed are critical in assisting investigators in providing plausible recommendations to prevent recurrence of like incidents.

When minor incidents (e.g., slips, trips, falls, near-miss, first aid, etc.) occur, even when there is no injury or damage; these incidents must be reported to your supervisor for the proper safety investigation and corrective action(s) to include trend analysis.

BCCI will conduct a thorough investigation of all incidents, accidents, exposures, and near-misses. Supervisory personnel will be primarily responsible for performing a safety investigation of all these events to include near-misses in their Area of Responsibility (AOR). The Superintendent, Safety Division, Management, and Insurance Company Representative will investigate any type of incident involving a fire, fatality, serious injury, or extensive property damage.

The primary goal of these investigation are the preservation of personnel and assets, while attempting to prevent the recurrence of the incident. This is accomplished through findings, causal findings, and recommendations produced from the investigation. After an employee sustains an injury at the workplace or project, the Superintendent is responsible for initial action of first aid treatment or obtaining professional medical attention (e.g., clinic, local emergency responders, or medical facility) as soon as possible; while preserving and protecting other personnel and equipment from further injury or damage. The Superintendent or Supervisor shall investigate the circumstances surrounding the incident.

Our Safety Division, Safety Committee, and Project Management Teams will review all incident and near miss investigations. The Safety Committee is tasked with this review and develops a "Lessons Learned" document to disseminate throughout the company.

RETURN TO DUTY

All personnel seeking to "Return to Duty" must provide documentation from their doctor stating they are fully cleared to work or placed on "Restricted Duty." Personnel must provide this documentation to their Superintendent or immediate Supervisor, who then provides a copy to the Director of Safety and Human Resources.

BCCI Management must approve all personnel returning to work. When personnel want to return to work without the proper documentation from a doctor, under NO circumstances will BCCI Construction, LLC, allow an employee to "Return to Duty" without the proper release documentation. There are NO exceptions.

INCIDENT – ACCIDENT – EXPOSURE – ILLNESS – NEAR-MISS FORM

Project Name:	Job Number:	Superintendent:
Employee Name:	Date of Mishap / Near Miss:	Time of Mishap / Near Miss: <input type="checkbox"/> am <input type="checkbox"/> pm
Occupation:	Company:	
Mishap Occurred in Which Department:	Location of Mishap / Near Miss:	
Was there Property Damage: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable	Property Management Company:	
Were there any Witnesses to the Mishap? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If Yes, Immediately Interview each Witness using the Witness Statement Form</i>	If Yes, List Names of Witnesses: 1. 2.	
Mishap Reported to (name):	Date Reported:	Time Reported: <input type="checkbox"/> am <input type="checkbox"/> pm
Who was in-charge at the time of the Mishap / Near Miss?		
Name of Person Completing Report:		Date:
Supervisor's Name:		Telephone:
Supervisor's Description of Events: <i>Supervisor: Interview Employee; then describe what happened (Who, What, When, Why, and How)</i>		

BODY PART INVOLVED – Check all which apply. Please Circle (R) or Left (L)			
Head Injury <input type="checkbox"/> Head <input type="checkbox"/> Face <input type="checkbox"/> Eye R or L <input type="checkbox"/> Nose <input type="checkbox"/> Ear R or L <input type="checkbox"/> Neck <input type="checkbox"/> Skin	Trunk Injury <input type="checkbox"/> Shoulder R or L <input type="checkbox"/> Upper Back <input type="checkbox"/> Middle Back <input type="checkbox"/> Lower Back <input type="checkbox"/> Chest <input type="checkbox"/> Rib R or L <input type="checkbox"/> Abdomen	Upper Body <input type="checkbox"/> Upper Arm R or L <input type="checkbox"/> Forearm R or L <input type="checkbox"/> Elbow R or L <input type="checkbox"/> Wrist R or L <input type="checkbox"/> Hand R or L <input type="checkbox"/> Finger(s) – Identify <input type="checkbox"/> Thumb L or R	Lower Body <input type="checkbox"/> Hip R or L <input type="checkbox"/> Leg R or L <input type="checkbox"/> Thigh R or L <input type="checkbox"/> Knee R or L <input type="checkbox"/> Calf R or L <input type="checkbox"/> Ankle R or L <input type="checkbox"/> Foot R or L <input type="checkbox"/> Toe(s) - Identify

NATURE of INJURY - - Check all Which Apply			
<input type="checkbox"/> Abrasion-Contusion <input type="checkbox"/> Bruise <input type="checkbox"/> Cut – Laceration <input type="checkbox"/> Puncture <input type="checkbox"/> Foreign Object	<input type="checkbox"/> Burn-Heat <input type="checkbox"/> Burn-Chemical <input type="checkbox"/> Exposure-Heat/Cold <input type="checkbox"/> Exposure-Chemical <input type="checkbox"/> Exposure-Haz-Mat	<input type="checkbox"/> Inhalation <input type="checkbox"/> Poisoning <input type="checkbox"/> Allergic Reaction <input type="checkbox"/> Skin Problem	<input type="checkbox"/> Sprain/Strain <input type="checkbox"/> Fracture <input type="checkbox"/> Repetitive Motion <input type="checkbox"/> Broken <input type="checkbox"/> Other (Specify)
CONTRIBUTING FACTORS		Describe Conditions Causing the Mishap/Near Miss	
<input type="checkbox"/> Lifting/Picking-Up Materials or Equipment <input type="checkbox"/> Loading/Unloading Materials or Equipment <input type="checkbox"/> Pushing/Pulling Materials or Equipment		Describe:	
<input type="checkbox"/> Slip, Trip, of Fall <input type="checkbox"/> Wet Surface <input type="checkbox"/> Object(s) Left on Floor <input type="checkbox"/> Uneven Surface <input type="checkbox"/> Damaged / Frayed Carpet /Flooring <input type="checkbox"/> Ascending / Descending Ladder or Stairs		Describe:	
<input type="checkbox"/> Struck by or Against Object(s) <input type="checkbox"/> Falling Item <input type="checkbox"/> Another Person		Describe:	
<input type="checkbox"/> Cut / Puncture <input type="checkbox"/> SHARPS / Knife / Material <input type="checkbox"/> Hand Tool or Machinery <input type="checkbox"/> Other Object		Describe:	
<input type="checkbox"/> Other:		Describe:	
CAUSE – Check all Which Apply			
<input type="checkbox"/> Poor Awareness <input type="checkbox"/> Complacency <input type="checkbox"/> Fatigue <input type="checkbox"/> Body Mechanics <input type="checkbox"/> Horseplay <input type="checkbox"/> Poor Ventilation <input type="checkbox"/> Fixation <input type="checkbox"/> Electrical Exposure	<input type="checkbox"/> Broken Equipment <input type="checkbox"/> Improper Equip Use <input type="checkbox"/> Confusion <input type="checkbox"/> Improper PPE <input type="checkbox"/> Falling Objects <input type="checkbox"/> Flame, Fire, Smoke <input type="checkbox"/> Physical Impairment <input type="checkbox"/> Building / Structure	<input type="checkbox"/> Floor Wet <input type="checkbox"/> Floor Uneven <input type="checkbox"/> Rushed <input type="checkbox"/> Furniture / Fixtures <input type="checkbox"/> Hand Tools <input type="checkbox"/> Distraction <input type="checkbox"/> Poor Housekeeping <input type="checkbox"/> Dehydration	<input type="checkbox"/> Stairs <input type="checkbox"/> Ladder Misuse <input type="checkbox"/> Railings <input type="checkbox"/> Struck By / Against <input type="checkbox"/> Unsafe Act <input type="checkbox"/> Unsafe Condition <input type="checkbox"/> Lack of Training <input type="checkbox"/> Overconfidence
PREVENTION		Responsible Person	Date Assigned
List Corrective Actions			Date Completed
RECORDKEEPING - - To be completed by Director of Safety			
Is this OSHA "Recordable" <input type="checkbox"/> Yes <input type="checkbox"/> No (OSHA 300 Log)	Is this OSHA "Reportable" <input type="checkbox"/> Yes <input type="checkbox"/> No	If Yes, Date OSHA Notified	
Supervisors Signature:			
Director of Safety Signature:			
Date to Safety Committee:			

EMPLOYEE REFUSAL OF MEDICAL TREATMENT FORM FORMULARIO de RECHAZO de TRATAMIENTO MEDICO del EMPLEADO

Use this form if an employee has a minor injury and they do not feel they need medical treatment. If the injured employee injuries are obvious; seek medical attention and/or call On-Site Health & Safety or 911. Remember to complete the Mishap/Near-Miss form.

Utilice este formulario si una empleado sufre una lesion menor y el mismo no considera que necesita tratamiento medico. Si la lesion del empleado resulta evidente, obtenga atencion medica y/o llame al On-Site Health & Safety or 911. Recuerde que también debe completare el "Formulario de Investigacion de Mishap/Near-Miss.

☐ Mu signature below confirms I AM NOT experiencing signs or symptoms resulting from this injury. Mi firma a continuación confirma que NO PRESENTO signos o síntomas debido a esta lesion.

☐ My signature below confirms I AM experiencing signs or symptoms resulting from this injury. These signs or Symptoms are: (Mi firma a continuación confirma que PRESENTO signos o síntomas debido a esta lecion. Dichos signos o síntomas son los Siguientes):

I hereby acknowledge my refusal or medical treatment and/or observation offered to me at the expense of BCCI for the injury described above. I understand signing this form does NOT necessarily affect my later eligibility of Worker's Compensation.

I acknowledge my supervisor(s), in good faith, have offered and made available to me an opportunity to seek medical treatment and/or observation for this injury. I am aware my declination of medical treatment currently; results in no responsibility on my employer's part for any medical expenses or lost wages relating to this injury.

I understand a Worker's Compensation Claim Form (DWC-1) is available to me. However, since I am not seeking medical treatment and/or observation, and I do NOT have a desire to file a claim for Worker's Compensation pertinent to the injury/illness described in this report, I have chosen NOT to accept and/or complete the claim form. I understand my rights regarding Worker's Compensation and DO NOT wish to exercise them currently.

Later, I may request from my employer, via my supervisor, authorization to obtain medical treatment and/or observation for this injury. At that time, I understand Worker's Compensation Claim Form (DWC-1) will be given to me. I understand per the Labor Code 5405 (a), where no benefits have been provided, I have a maximum period of one year from the date of injury to initiate a request for medical treatment and benefits.

Por el presente confirmo my rechazo del tratamiento y/u observación médica que me ofreció a su cargo BCCI por la lesión que sedescribe m s arriba. omprendo que firmar este formulario no afecta necesariamente mi elegibilidad posterior para Compensación al Trabajador.

Confirmo que mi(s) supervisor(es), de buena fe, me ofreció/me ofrecieron y puso/pusieron a mi disposición una oportunidad de recibir tratamiento y/u observación médica por esta lesión. Soy consciente de que mi rechazo del tratamiento médico en este momento no generaninguna responsabilidad a mi empleador por ningun gastos médico o salarios perdido relacionado con esta lesión.

Comprendo que se encuentra disponible para mí un Formulario de Reclamo de Compensación al Trabajador (DWC - 1). Sin embargo, debido a que no solicito tratamiento y/u observación médica y no deseo presentar un reclamo de Compensación al Trabajador pertinente a la lesión/enfermedad que se describe en este informe, decidí no aceptar y/o completar el formulario de reclamo. Comprendo mis derechos en lo que se refiere a Compensación al Trabajador y no deseo ejercerlos en esta oportunidad.

Mas adelante, es posible que solicite a mi empleador, por intermedio de mi supervisor, autorización para obtener tratamiento y/u observación médica por esta lesión. omprendo que en ese momento me entregar n un Formulario de Reclamo de Compensación al Trabajador (DWC -1). Comprendo que segun 5405(a) del Código de Trabajo, en los casos en los que no se proporcionaron beneficios, cuento con un plazo maximo de un a o desde la fecha de la lesión para presentar una solicitud de tratamiento médico y beneficios

INJURED WORKER OR WITNESS STATEMENT

I _____ am submitting this written statement on _____.

To _____ of BCCI Construction, LLC. The submission of this statement is of my own free will and I have NOT been coerced or threatened in any manner of this submission of my statement.

IN YOUR OWN WORDS DESCRIBED WHAT HAPPENED (Who, What, Where, When, & How)

Did you witness the Mishap? ☐ YES ☐ NO

What were you doing prior to the incident?

What were you doing after the mishap?

Signature:

Date:

Employer:

Employer Address & Telephone Number:

6.0 HAZARD ABATEMENT

California Code of Regulations (CCR), Title 8, Section §3203 (a) (6)

Under NO circumstances will any personnel be required, permitted, or work under any conditions, which pose a clear or Imminent Danger Hazard.

Unsafe or Unhealthy work conditions, procedures, or processes at our work facilities shall be corrected in a timely manner based on the severity of the hazards, and according to the following procedures:

- When discovered or observed.
- When an Imminent Danger Hazard exists, which cannot immediately be abated without endangering personnel or property.
 - Remove all exposed personnel from the area except those necessary to correct the existing condition.
 - Personnel necessary to correct the Imminent Danger Hazard shall be provided with the necessary safeguards.

Any identified hazards, which not corrected at the lowest level possible, will be assigned to the Responsible Person who will ensure the hazard is corrected and completed. Once corrected, a written response and all documentation related to the correction must be forwarded to the Safety Division for proper Records Management. The Responsible Person or their designated representative will immediately correct any unsafe work practices and procedures observed.

Any person has the right to report a hazard and to report anonymously. BCCI has a Safety Hazard Report Form, which any one person on the project can complete and turn into the Superintendent or Director of Safety for action. Once received personnel are to use the hierarchy of controls to eliminate the hazard. This hierarchy consist of Engineering Controls, which is the first line to eliminate or mitigate the issue. Administrative Controls are plans, procedures, directions to aid in the elimination and mitigation of the hazard. If Engineering Controls or Administrative Controls cannot adequately mitigate the hazard, Personal Protective Equipment (PPE) is the last of the hierarchy to instituted.

RECORDKEEPING

The Director of Safety or Safety Coordinator will annotate any identified hazards on the Hazard Abatement Log and these items monitored to closure. As abated hazards are corrected, the corrective actions implemented are documented, which must include the methods and dates of abatement. All documentation shall be maintained for 1 year or unless otherwise specified. Any unsafe condition, which cannot be corrected with the current resources available; shall immediately contact the Safety Division for guidance.

BCCI HAZARD REPORT

HAZARD <i>(to be Completed by Individual Report Hazard)</i>		
HAZARD REPORT NUMBER: (Assigned by Director of Safety)		
TO: BCCI DIRECTOR of SAFETY		FROM: <i>(Name Optional)</i>
LOCATION: <i>(Project & Location on Project)</i>		
DESCRIPTION of HAZARD: <i>(Date, Time, Summary, Who, What, Where, When, & How)</i>		
RECOMMENDATIONS: <i>(Not Required – However Encouraged)</i>		
DATE RECEIVED:	DIRECTOR of SAFETY:	SIGNATURE of DIRECTOR of SAFETY:

7.0 TRAINING AND INSTRUCTION

California Code of Regulations (CCR), Title 8, Section §3203 (a) (7)

All BCCI personnel shall receive training and instruction on general and project specific safety and health practices. Additionally, personnel will receive guidance on the Company's Policies, Procedures, and Specific Safety Programs. The programs include:

- Safety 360° Program, Heat Illness Prevention Program, Fall Protection Program.
- Hazard Communication Program, Respiratory Protection Program.
- Respirable Crystalline Silica Program, First Aid, CPR, AED Certification.
- OSHA 10- & 30-Hour Training in Construction.
- Mobile Elevated Working Platforms (MEWP), Code of Safe Work Practices.
- COVID-19 Written Prevention Program and Protocols.
- Injury Illness Prevention Program (IIPP).
- Mishap – Near Miss Reporting Procedures.
- Personal Protective Equipment (PPE) use, storage, and sanitization.
- Business Continuity Plan (Emergency Response Procedures).
- Hazard Reporting Procedures, Health & Safety Plan for Project Sites.
- Asbestos (ACM) and Lead Awareness Training.
- Lock-Out / Tag-Out (LOTO) Awareness Training.

TIERED TRAINING PROGRAM

Tier 1 – GENERAL SAFETY TRAINING

- General Company Orientation provided by Human Resources and other departments to include Safety for all newly hired employees.
- Include information on company policies, procedures, and processes, to include their rights and responsibilities to the safety program.

Tier 2 – HAZARD SPECIFIC SAFETY TRAINING

- The Safety Division provides training to BCCI Personnel when special hazards may be encountered.
- Examples of training topics include ergonomics, hazard communication, emergency and evacuation response, fire watch, forklift safety, mobile elevated working platform safety.

- The Safety Division of BCCI conducts and modifies Tier 2 training programs for adequacy, currency, and consistency.

Tier 3 – JOB SPECIFIC TRAINING

- Superintendent and Safety Division provide training, which is specifically related to the project.
- Training consists of the Job Safety Orientation (JSO), specific hazards and equipment on the site and used by personnel. Training is also communicated by one or more means of methods; safety meetings (formal or informal), Safety Data Sheets (SDSs), postings, etc.

TRAINING SCHEDULE

Training WILL be provided to all personnel as follows:

- When New Hire Employees Arrived on Station.
- When Current Employees are promoted, placed in new assignments.
- When processes, procedures, work environment, or equipment changes or are introduced to the workplace or project and present new hazards.
- When the Employer is made aware of a new or previously unrecognized hazard.
- When personnel are promoted into a supervisory position:
 - Become familiar with safety and health hazards.
 - Become familiar with the next level of safety management.
 - Become familiar with ways to eliminate or mitigate hazards.

8.0 RECORDKEEPING

California Code of Regulations (CCR), Title 8, Section §3202 (b)

In Accordance with California Code of Regulations; Title 8; Section § 14300-§14300.48, we will maintain records of actions taken to implement, maintain, and sustain the Company's Injury Illness Prevention Program (IIPP). All records maintained will be on file for a minimum of 1 year.

Additionally, in accordance with California Code of Regulations (CCR), Title 8, Section §3204, Access to Employee Exposure and Medical Records, the records maintained by BCCI Construction, LLC in relation to the IIPP will not adversely affect the retention of the medical and exposure records. These records will also be maintained beyond the employee's service to the company.

The inspection record(s) for any project or workplace WILL include:

- Name of Person performing the inspection.
- Date, Location, Type of Inspection.
- Findings and Category of Finding (e.g., Minor, Significant, or Critical).
- Recommendations to Correct Finding(s).
- Photographs of the Findings and Positive Program Management.
- Corrective Actions and Photographs of corrected Items.
- Unsafe Conditions, Practices, Procedures, and Processes.

These records will be maintained electronically in ProCore for the specific project or workplace and on the company shared drive for a minimum of 1 year.

The documentation (records) for all safety and health training for each employee will have the following information:

- Date, Time, Location of Training.
- Training Topic.
- Instructor(s).
- Name, Signature, and Division

These maintained documents will be electronically stored on the company-shared drive and dates of training annotated on the company Microsoft Excel Training Matrix and Microsoft One Note, which the Director of Safety manages, updates, and maintains regularly. Any personnel who were employed for less than one year may request a copy of their training records. The terminated employee must sign the Letter of Acknowledgement, which states they have received their training records.

During the year, the Director of Safety is accountable for the completion of the OSHA 300 Log. Entries for the calendar year are annotated for every occurrence of a recordable injury or illness. If an entry cannot be annotated immediately, the Director of Safety must record the information within seven business days.

Senior Leadership will review and sign the Summary of the OSHA 300A log at the end of the year. Once the OSHA 300A is completed; this document will be properly posted at each area office from 01 February to 30 April as required by the OSHA Act and the same information will be reported electronically through virtual means.

APPENDICES AND SOURCES

- Safety Recognition Program.
- Safety 360° Document.
- Code of Safe Work Practices (Safety Manual) Table of Contents Reference.
- California Code of Regulations, Title 8, Section §3203, paragraph (c) (1) – (7), Safety Committee Requirements.
- California Code of Regulations, Title 8, Section §9881, Posting of Notice to Employees.

SAFETY RECOGNITION PROGRAM

Regional Safety 360° Stickers

The Regional Safety Recognition Stickers are to be awarded to individuals who have embraced and reflect the Safety 360° culture while exhibiting safe behavior both in the office or on BCCI project sites.

- Eligible sticker recipients are BCCI employees, sub-contractors, architects, clients & client vendors.
- Stickers may also be awarded to internal BCCI personnel working in the office, distributed by a Safety Committee Team member or Office Manager.
- On the project, these stickers are distributed by the project Superintendent, PM, APM, or PE at their discretion to individual(s) who display physical act(s) which contribute or support the Safety360° program.
- Some examples of Safety 360° Sticker qualifications are:
 - The wearing of task-specific PPE which exceeds the BCCI Daily PPE requirements (e.g., pipe fitter working next to an open hole with correct fall protection and anchorage, millworkers operating equipment with proper machine guarding, etc.).
 - Correcting a hazard or preventing a mishap.
 - Coaching fellow tradesman or other personnel about Safety 360°.
 - Bringing awareness to a potential safety issue, hazard, or concern.
 - Embracing and sharing the spirit and culture of Safety 360° which leads to “leading by example”

BCCI CONSTRUCTION, LLC – SAFETY 360°

The BCCI Safety 360° initiative is a pillar and foundation of our identity as a company. We believe our employees and workforce should never worry about returning home safely and our clients should never worry about the safety of their staff and visitors.

Our approach to safety is different; for us safety is a passion, not an obligation. All our personnel receive annual safety coaching from our dedicated Safety Department, which includes role play scenarios or tabletop exercises tailored to specific work environments; lessons-learned discussions and new best practices; and leadership training so everyone is engaged and becomes not only a voice for safety, but they also become their own ambassador to safety. We expect continuous growth and innovation from our teams, which ranges from adopting new leading-edge technology to testing cutting-edge emergency and safety measures. In turn, our investment in safety benefits our clients who avoid safety-related impacts to their projects and rest assured of their staff and visitors' safety.

FOUR KEY COMPONENTS OF SAFETY 360°

Awareness:

We foster a 360° view of safety physically and philosophically. We expect active engagement from each employee in their immediate environment, as well as awareness of activities above, below, and adjacent. This means we look out for one another's physical and mental safety and ensure everyone is empowered to speak up about safety.

Shared Responsibility:

Personnel receive annual safety coaching and mentoring. We believe the best way to increase accountability is to increase responsibility, so superintendents and project managers are as engaged in safety as our dedicated Safety Department team members.

Behavior:

A key component of our approach is avoiding risky behaviors all together, as this behavior is the primary contributory cause in over 80% of all accidents. Behavioral change is the key; and we are changing behaviors to support a strong safety culture which solicits feedback, engages our workforce, and empowers people to make a difference.

Positivity:

Our coaching takes a preventative approach and is defined by positivity rather than enforcement and punishment.

BCCI CONSTRUCTION, LLC – CODE OF SAFE WORK PRACTICES

The BCCI Code of Safe Work Practices is an independent stand-alone document which coincides with the Injury Illness Prevention Program. This document like the IIPP is a live document and is annually reviewed to ensure compliance with Safety Standards, Regulations, Directives, etc. These two (2) documents will be presented upon request to any compliance officer, investigator, etc.

Contents of this manual range from our Code of Conduct, Hazard Communication, COVID-19 Written Program, Workplace Violence, Heat Illness Prevention Program, Infectious Control, First Aid, CPR, AED, OSHA 10- & 30-Hour, Incident Reporting, Electrical Safety, and many other topics required.

SAFETY COMMITTEE REQUIREMENTS

California Code of Regulations (CCR), Title 8, Section §3203 (c) (1) – (7)

- (c) Employers who elect to use a labor/management safety and health committee to comply with the communication requirements of subsection (a) (3) of this section shall be presumed to be in substantial compliance with subsection (a) (3) if the committee:
 - (1) Meets regularly, but not less than quarterly.
 - (2) Prepares and makes available to the affected employees, written records of the safety and health issues discussed at the committee meetings and maintained for review by the Division upon request. The committee meeting records shall be maintained for at least one (1) year.
 - (3) Reviews results of the periodic, scheduled worksite inspections.
 - (4) Reviews investigations of occupational accidents and causes of incidents resulting in occupational injury, occupational illness, or exposure to hazardous substances and, where appropriate, submits suggestions to management for the prevention of future incidents.
 - (5) Reviews investigations of alleged hazardous conditions brought to the attention of any committee member. When determined necessary by the committee, the committee may conduct its own inspection and investigation to assist in remedial solutions.
 - (6) Submits recommendations to assist in the evaluation of employee safety suggestions.
 - (7) Upon request from the Division, verifies abatement action taken by the employer to abate citations issued by the Division.

POSTING OF NOTICE TO EMPLOYEES

California Code of Regulations (CCR) < Title 8, Section §9881

- (a) Every employer shall post and keep posted in a conspicuous location frequented by employees during the hours of the workday a Notice to Employees.
- (b) The Notice to Employees poster shall be easily understandable. It shall be posted in both English and Spanish where there are Spanish-speaking employees.
- (c) The Notice to Employees poster shall include the following information:
 - (1) The name of the current compensation insurance carrier of the employer, or when such is the fact, that the employer is self-insured, and who is responsible for claims adjustment.
 - (2) How to get emergency medical treatment, if needed.
 - (3) Emergency telephone number(s), for hospital, ambulance, police and firefighting services.
 - (4) The kinds of events, injuries and illnesses covered by workers' compensation.
 - (5) Advice that the employer may not be responsible for compensation because of an injury due to the employee's voluntary participation in any off-duty recreational, social, or athletic activity that is not a part of the employee's work-related duties.
 - (6) The injured employee's right to receive medical care.
 - (7) The rights of the employee to select and change the treating physician pursuant to the provisions of Labor Code Section 4600, including the right to predesignate a personal physician or medical group.
 - (8) The rights of the employee to receive temporary disability indemnity, permanent disability indemnity, supplemental job displacement benefits, and death benefits, as appropriate.
 - (9) To whom the injuries should be reported.
 - (10) The existence of time limits for the employer to be notified of an occupational injury.
 - (11) The protections against discrimination provided pursuant to Labor Code Section 132a.
 - (12) The location and telephone number of the nearest information and assistance officer.
 - (13) A description about Medical Provider Networks ("MPN") which includes what a MPN is, the pre- designation exemption from the MPN, when an employee must begin to use a physician from the MPN, and how to request information

about using an MPN. The MPN Contact telephone number, address and, if available, the MPN website address/URL shall be included. The effective date of MPN coverage for the MPN being used by the employer to cover current injuries shall also be stated if the employer is using an MPN.

(d) The employer may post the Administrative Director's approved Notice to Employee Poster provided in Section 9881.1. If the employer chooses not to use the Notice to Employee Poster provided in Section 9881.1, the employer may use a poster which meets the posting requirements of Labor Code Section 3550, includes the information required by this regulation, and has been approved by the Administrative Director.