

Subcontractor Management Plan

Updated August 2024

Purpose

This Subcontractor Management Plan is designed to protect E Light Electric Services, Inc. and subcontractor employees, equipment from injury, accident or loss. Subcontractors are persons not directly employed by E Light Electric Services, Inc. but who provide specific labor or services.

Examples of Subcontractor Employers are:

- Construction Companies
- Utility Service or Repair Companies
- Janitorial Services
- Equipment Repair Personnel
- Pest Control Services
- Vehicle and Machinery Mechanics
- Transportation & Shipping Services

Policy

It is essential that subcontractors understand E Light Electrical Services, Inc.'s expectations and requirements upfront in order to be fully prepared to meet them. Understanding and complying with our safety requirements are critical in ensuring a successful partnership between E Light Electrical Services Inc. and its subcontractors.

As a condition of doing business with E Light all subcontractors must comply with applicable local, state, federal regulatory requirements and E Light's safety procedures and policies. All subcontractors will be prequalified by E Light by reviewing:

- Safety programs
- Safety training documents
- Safety statistics and reports
- EMR
- TRIR
- OSHA Log 300's

E Light will compare each subcontractor's performance to others in their industry. Those who outperform the industry should be selected whenever practicable.

E Light personnel responsible for managing contracts will ensure that:

1. Each subcontractor is provided with warnings of hazards and information about our Company programs for abating these hazards;
2. Each subcontractor is informed of our Company's safety, health, and environmental requirements; and

3. The work is conducted in a safe and responsible manner in compliance with applicable regulations and our Company's requirements.

Our Company's Contracting Officer will ensure that the contract language requires the subcontractor to:

1. Meet all applicable federal, state, and local environmental, health, and safety regulations and our Company's requirements.
2. Provide their employees with the necessary training, medical exams, and safety equipment.
3. Submit written comprehensive safety and health plan for the specific contract undertaken.
4. Comply with all applicable federal, state, and local regulations and our Company's requirements, with violation being grounds for default of the contract.

E Light Electrical Services Inc. will review and monitor the subcontractor's adherence to its written health and safety plan and all applicable environmental, health, and safety requirements. The subcontractor is responsible for meeting all contractual agreements and for providing a safe and healthy workplace for its employees.

The subcontractor will:

- Provide for daily, frequent and regular safety inspections of the work sites, materials, and equipment by competent employees.
- Ensure subcontractor employees attend site orientation prior to performing work.
- Notify the Project Manager of construction accidents in a timely manner.
- Notify the Project Manager of any non-formal OSHA complaint notifications and/or OSHA inspection(s) of the job site.
- Identify and correct hazards
- Provide subcontractor employees with requires personal protective equipment
- Ensure subcontractor Employees have the proper training for assigned tasks
- Coordinate with our Project Compliance Officer for safety related issues
- Maintain required insurance coverage
- Establish and maintain an effective Safety and Health Program
- Establish and maintain an effective Housekeeping Program
- Attend all pre-job safety meetings
- Conduct Pre-job Hazard Assessments

The Subcontractor Health and Safety Plan:

When required by the contract, the subcontractor must develop and implement a comprehensive health and safety plan for his or her employees which covers all aspects of onsite construction operations and activities associated with the contract. This plan must comply with all applicable health and safety regulations and any project-specific requirements that our Company has specified. The subcontractor must provide our Contracting Officer with a copy of this plan with their bid package.

Acceptance of the subcontractor's health and safety plan only signifies that the plan generally conforms to the requirements of the contract. It does not relieve the subcontractor of the

responsibility for providing employees with a safe and healthful work environment. This concept must be communicated to the subcontractor by our Contracting Officer and also incorporated into the contract document.

Subcontractor Relations

Subcontractors' participation and inclusion in E Light projects and safety initiatives are desired and are to be included in E Light operations. Subcontractors assigned by E Light to a project will attend and participate in:

- daily tailgate meetings and awareness activities;
- weekly safety meetings;
- jobsite safety inspections;
- ongoing safety and planning meetings;
- coordination meetings.
- incident, injury and illness response planning and
- project safety orientations;
- incident reporting and investigation procedures; and
- other such safety, health and incident prevention initiatives as may be established for all workers at a project location.

Safety Training

The subcontractor must ensure that their employees have completed appropriate health and safety training when required by statute/regulation and our Company's requirements and provide documentation of such training when required by the contract.

Incident Reporting

Subcontractors will assist and cooperate with the investigations of incidents resulting in injury/illness and/or damage or loss of property and also near misses.

Post-Project Review

E Light requires a post-job safety review at the completion of work. The purpose of this is to review the job and identify items that worked well and those that could be improved. As with the "Pre-Job" safety meetings, the extent and formality of the meeting will be based on the scope of the job. E Light will make a review of each Subcontractor's safety performance, incident and injury experience, identify lessons learned and other factors that will be helpful in evaluating the subcontractor's suitability for future projects. This will also assure better planning and a safer work experience the next time the job has to be performed. In the event that a subcontractor exits or is terminated from a project that remains in progress, a similar timely review will be performed. Post-project evaluations will be performed by The Director of Education and Loss Prevention in coordination with the Project Manager and supervisors who worked with the Subcontractor during the specific project under review.