



T.A. WOODS COMPANY SUPERVISORS GUIDE TO EMPLOYEE HANDBOOK/POLICIES

2/2011

The following correlates with the TAW Employee Handbook and company policies. This is intended as a guide for supervisors and managers. **ALWAYS CONTACT HUMAN RESOURCES** if you do not have a clear understanding of a policy or procedure. Do not communicate erroneous or misleading information.

***Employment at Will Disclaimer**

Employment with T.A. Woods Company is not contractual meaning that either the company or the employee can end the employment relationship. Not contractual means that the termination of employment can't be litigated unless another issue is present such as a violation of a law including discrimination, harassment, not accommodating a protected medical condition or a similar.

NC is an at-will state, but remember there are many factors to consider when determining involuntary termination of employment. Although employment is at will, TAW may be held legally and/or financially responsible if there is a violation of state/federal statutes or if evidence presented does not provide sufficient documentation supporting the termination. Supervisors must follow the procedures listed in this Handbook as well as directives by management. Note that Human Resources must approve all employee discharges **PRIOR** to termination conference. As supervisors and managers, it is your responsibility to maintain consistency and fairness when dealing with employees. This decreases liability.

Documentation is essential, especially if an employee is discharged for misconduct or violation of company rules. Employee Interventions and Warnings provide evidence of a systematic approach to changing undesirable or disruptive behavior prior to discharge.

Discuss problematic situations with your general superintendent or Human Resources. Do not ignore employee behavior that violates company rules and policies. Rather initiate a conference with the employee and document appropriately on an Employee Intervention or Employee Warning. Our goal is to stop problematic behavior and help employees reach professional success which in turn creates a more successful company for all.

Standards and documentation practices will be addressed throughout this guide.

Employee Handbook

All employees are provided an Employee Handbook during the New Hire Orientation. It is stated that they must read the Handbook and return the sign off page within 5 days of hire. As a supervisor, you should witness the signature. Return with your weekly documents.

Employees are provided up to 3 memos inserted in their paycheck envelopes as reminders to return the sign off copy. If not returned prior to the 90th day of employment, the Orientation

Appraisal will be postponed. If not returned prior to the 100th day of employment, the employee may be discharged. An employee may request an additional copy of the Employee Handbook; a replacement fee will be charged.

Equal Employment Opportunity

TAW is an equal opportunity employer. Non-discrimination policies are mandated and practiced. If an employee feels he/she has not been provided equal opportunity based on race, religion, ethnicity, gender, age, nationality, handicap, disability, genetic information, veteran status or any other condition protected by law, the situation must be investigated.

Thus again, this emphasizes importance of treating all employees fair and consistent according to TAW policies. If an employee has a complaint regarding equal and fair treatment, he/she should contact Human Resources. If he/she brings it to your attention, you should contact HR. Do not ignore or down play the information presented.

Efforts will be taken to publicize and post job openings using mixed media such as ESC job boards, newspaper advertisements, internet posting, written communication, college/training programs, career placement services, and various other media. It is the goal of TAW to promote diversity throughout the workplace.

Accommodation of Disabilities and Other Medical Conditions

This provision complies with the American with Disabilities Act. TAW will accommodate applicants and employees in a reasonable manner regarding disabilities as determined by the ADA. Situations are different, and Human Resources should be contacted immediately to determine if the employee meets the conditions of ADA. DO NOT voice your opinion to the employee or about the employee's condition.

DO NOT discuss an employee's disability with a co-worker, crew member, or other person unless approved by management. This information is considered confidential and is protected under the provisions of ADA and HIPPA. Information will be shared with you as deemed appropriate by Human Resources.

If an employee shares personal information with you regarding medical status, enrollment in rehabilitation services, current disabilities, or the like, advise him/her at the onset of the conversation that you must share this information with Human Resources. If information is not provided to HR, you may personally be held liable for not meeting the provisions of the ADA.

Harassment Policy

Harassment comes in many forms. It is intended to intimidate, demean, or coerce. It is any verbal, physical, or visual conduct that belittles a person because of race, religion, ethnicity, origin, gender, age, disability or other protected status. It includes sexual harassment such as sexual propositions, innuendoes, suggestive comments, teasing, jokes, obscene gestures/language, sexually suggestive pictures and/or physical conduct.

If harassment is reported to you or you observe any form of harassing behaviors, **CONTACT HUMAN RESOURCES IMMEDIATELY. Under no circumstances are you to attempt to handle this on your own.** DO NOT tell the reporting employee to "deal with it" or "to stay

away from that person”. TAW has an investigative process to handle all complaints of harassment. The process includes interviewing the affected employee, witnesses, both inside and outside of the company, to determine if harassment occurred and the consequences associated with the behaviors.

Sexual conduct becomes unlawful when it is unwelcome meaning the behavior is not solicited or invited and is regarded as undesirable or offensive. The conduct is sexually aggressive or sexually oriented. The following is an example list of potentially harassing conduct. Physical conduct includes touching, brushing, rubbing, or hugging, and grabbing. Verbal conduct includes sexual offers, offensive jokes or remarks, threatening or pressure for sexual favors. Nonverbal conduct includes posting sexually offensive cartoons or other documents, transmitting offensive emails and faxes, staring, hovering, and gesturing.

It is important that you understand your responsibility associated with stopping and reporting harassment. Even if the employee does not report the harassing behaviors to you but you observe them or are told of them, TAW must take action. Again, **CONTACT HUMAN RESOURCES IMMEDIATELY**. As a supervisor or manager, you can be held legally accountable for not acting upon reported and/or known harassment of any type.

As a supervisor, you should not communicate in words that can be misconstrued. Do not comment on a worker’s age. Do not assign females only “traditional female tasks”. Do not create a hostile environment. Do not tell or allow employees to tell racial jokes or use racial language. Do not have pictures posted in trailers such as the Tool Girl calendar or others that could be considered offensive. Do not use terms that denounce a group. As well, do not allow any TAW employee or other company workers to have these behaviors. It is your duty to explain that the behavior is a violation of our harassment policy and continued violation will result in disciplinary action up to and including discharge for cause. Document every stage of this type situation.

When holding an employee conference to discuss or to initiate investigating potential harassment, it is beneficial to have a manager, superintendent, foreman/woman or lead in the conference with you in order to serve as a witness to the conference. This witness will not participate in the conference, but serve as an observer of the conference for both you and the effected employee.

If allegations of harassment are made against you as a supervisor, the same investigative process will be conducted. Any employee in violation of our harassment policy will face disciplinary procedures including termination for cause.

If allegations are made against a vendor, general contractor, subcontractor, or any other entity associated with TAW, **CONTACT HUMAN RESOURCES IMMEDIATELY**.

Ensuring that all employees understand our policy, early investigation with appropriate documentation, and corrective action are essential components of our Harassment Policy. It is the right of all employees to work in a harassment-free, fair environment.

Employment Status

Orientation:

Employees are those who are still within the 90-day initial hire period. This is a trial period to determine if the skill level presented during the interview process is observed while working. Issues related to skill, production, behaviors toward other employees and the like should be noted. This time frame allows both the orientation employee and supervisor an opportunity to ensure that it is a good fit for all.

It is important to efficiently determine if employment will be maintained. It is just as important to determine if the orientation employee is meeting the requirements of his position/status. Make sure you know the status of each employee on your project. It is unfair to access an Apprentice II the same as a Mechanic II. If he/she is hired as a Mechanic I, are they capable completing the associated tasks at a minimum of a satisfactory level? Should there be a reclassification? Discuss with your division general superintendent, project manager or Human Resources. Appropriate documents will be forwarded as a means of assessment.

However, do not wait until the employee is at his/her 90th day of employment to inform of deficiencies. It is unfair to the employee, crew members, and the project to allow an employee to continue working without notifying them through documented Employee Interventions or Employee Warnings of problems. Employees who can't perform at the hired status, will be reclassified or discharged. Apply measurement standards consistently and fairly to all employees. Division general superintendents will become involved once notified of this situation. The work-tasks listed on the Interview Document/Task Analysis will serve as an initial evaluation prior to the 90th day. A copy of the employee's Task Analysis will be forwarded to you upon request.

It is beneficial to assign a mentor employee to an orientation employee. The mentor maybe the mechanic for which the apprentice will initially work or it maybe a same-status employee who has experience with the company. Select the mentor appropriately as he/she will help set the expected work and safety behaviors of the new employee. If the original mentor-orientation relationship does not seem effective, assign the orientation employee to a new mentor for the remainder of his/her first 90-days.

Regular Full-Time Employees:

Passed the 90-day orientation period and work a minimum average of 32 hours per week on a continuous and regular basis. If hours are decreased or increased, Human Resources will assess the status.

Part-Time Employees:

Work less than 32 hours per week on a continuous and regular basis or are employed on a seasonal or temporary basis.

Promotion:

Determined by general superintendents, managers, and/or Human Resources.

No promotion:

Will be determined solely by a superintendent or foreperson.

This means field supervisor will not tell a mechanic that he/she is now a leadperson or other status.

This type of information should not be recorded on Appraisal documents until authorized by the division general superintendent and/or Human Resources. Promotions will be preceded by a written Employee Appraisal. No promotion will take place prior to Human Resources approval.

Demotion:

Determined by general superintendents, managers, and/or Human Resources.

The steps mentioned for promotion will be followed. Early intervention by field supervision is essential in the case of demotion. Demotions will not be approved unless appropriate documents and employee conferences have been held. No demotion will take place prior to Human Resources approval.

Transfer Requests:

Must be in writing and provided to division general superintendents. These will be forwarded to Human Resources and maintained with active applications for a period of 60 days.

Involuntary transfers due to economic conditions or project needs maybe warranted without employee request/consent. Refusing this transfer will warrant involuntary termination of employment for cause.

Involuntary Termination due to violation of company policies, skill set, or production:

Requires appropriate documentation of Employee Interventions and/or Warnings showing TAW's efforts to assist the employee in changing problematic behaviors. When dealing with behaviors such as those listed under Category I Rules, prior interventions/warnings may not be necessary for immediate termination. **NO discharge** will take place without discussion with the general superintendent or manager with final approval by Human Resources.

Termination conferences should be held in the business office by the division general superintendent or other management personnel. A Termination Report will be completed and signed. The week's timesheet will be presented for review and signing. Thus, supervisors must provide this prior to the termination conference. Discharge of orientation employees will follow the same procedures noting the following timeline. Early Notification to division general superintendent, project manager and/or Human Resources should occur prior to the 25th day of employment for issues related absenteeism, production, and other violations of company policy and procedures. Issues related to inability to perform assigned tasks, quality of installation, absenteeism, violation of policies/procedures, and the like must be reported prior to 90th day Orientation Appraisal of employment and preferably much sooner in order to take appropriate steps.

If the employee does not gather his/her belongings from the work site prior to the termination conference, supervisors should take care in securing these and transporting to the business office. Terminated employees should not return to the work site. All TAW property issued to the terminated employee should be inspected and returned.

Termination requires immediate notification to payroll. The employee should be advised that he/she has the right to contact Human Resources for a conference regarding the termination, continuation of insurance, 401k/profit sharing distributions, and the like.

Reduction of Force:

This is considered an involuntary termination. However, the procedures listed above are not applicable. ROF conferences may be held at the business office by a division general superintendent or field office by the superintendent. This conference should be held at the end of the workday with sufficient time for the employee to gather personal belongings. A supervisor or designated employee should “walk” the site/work area/task area with the employee to ensure all tools/belongings, etc are those of the employee.

Employees should not be permitted to perform any work tasks after the ROF conference.

At the onset of the conference, the employee’s timesheet should be presented for review and signing. A Termination Report should be completed. Review this document with the employee, ensuring that appropriate time is given to read the bottom section of the document prior to signing. This document should be forwarded to Human Resources.

Resignation:

Requires a written statement of resignation by the employee which incorporates the date of notification, the last day worked, and his/her signature. In addition, a Termination Report will be completed and attached to the written resignation notice. It is important that the written resignation is dated appropriately, legible, and has the employee’s signature. Notify the division general superintendent immediately regarding an employee resignation. Employees should be advised to contact Human Resources regarding insurance continuation, 401k/profit sharing distributions, and the like. Note that employee can’t rescind a resignation at will.

Rehire:

At the discretion of TAW. Do not inform an employee that he will be rehired as eligibility for rehire is determined by Human Resources. All interested candidates must complete and return an application. No candidate will be hired without following appropriate application procedures.

Rehire status is dependent upon previous employment. TAW is under no obligation to rehire any former employee.

Moonlighting:

Stated clearly in the Employee Handbook. Additionally, supervisors are prohibited from moonlighting in his/her trade. Employees working without a license and appropriate liability insurance are subject to legal action. Under no circumstances should a supervisor solicit TAW

employees to work with him/her on side work. This is grounds for immediate discharge of the supervisor and employee(s).

Take care to observe employees who work second jobs as they are more prone to be tired coming to work, have higher rates of absenteeism, as well as other potential issues. If you find this to be the case, hold a conference with the employee. Document the conference on an Employee Intervention or Employee Warning sheet depending upon the circumstances. Forward to the original to Human Resources for filing. If the problem(s) persist, contact division general superintendent, project manager, and/or Human Resources.

Retirement:

Refer employee to Human Resources.

Personnel Policies, Records, and Privacy

Understanding that all personnel matters are private and protected:

Protected by numerous employment laws are essential for a manager, superintendent, foreperson, and leadperson. Discussing personnel information in a public setting, a setting where information can be overheard, or with non-authorized employees or others outside of the company puts TAW and YOU at risk. **ALL Personnel matters are to be confidential.** Exchange of personnel information is appropriate with superintendents, general superintendents, project managers, and Human Resources as determined by the situation/circumstances. If an employee provides you information related to medical issues, personal situations that create problems while on the job, and similar problems, you have a duty to provide this to your division general superintendent and/or Human Resources. Conditions related to FMLA, ADA, EEO should be reported directly to Human Resources. Superintendents may discuss certain personnel matters such as production, quality, attendance, and violation of company policies and procedures with forepersons and leadpersons. However, there are still limits to this. If in doubt, don't proceed with the sharing of information. Contact Human Resources.

Employee Investigative or Disciplinary Conferences

If you conduct an Employee Conference, appropriate documentation such as an Employee Intervention or Employee Warning should be completed. If the conference does not concern violation of policy, procedure, attendance, quality, or production and will not be recorded on one of these forms, take appropriate notes with the intent of providing these notes to Human Resources for filing in the employee's personnel folder. Contact Human Resources after the conference for further instructions.

Example: You see an employee being harassed by another employee. You conduct a conference (have foreperson or lead as witness) privately with each employee. Maintain a log of information discussed.

Contact HR immediately for directives.

Example: Employee states in private that his wife is ill, and he will need time off. Maintain a log of the information discussed. Contact HR for directives

Example: Employee states that another employee stole her tool. Maintain log of information discussed. Contact general superintendent or HR for directives.

When creating documentation, record the date, employee(s) and witness (if applicable) involved in conference, and location of conference at the top of your page. Maintain clear, concise notes that are understandable. Forward notes to Human Resources.

As stated earlier, it is recommended that a general superintendent, other superintendent, foreperson, or lead be present during the conference. If disciplinary procedures will be implemented, this proactive approach will help maintain a sense of order and provide a witness for both parties. Only one supervisor should lead the conference. Thus, if you are holding a disciplinary conference, you may request that a foreperson be present. However, he/she serves as a witness and **does not become involved in the discussion**. Opening the conference by stating that he/she will serve as a witness for both parties is beneficial. Permitting the witness to become involved can create a perception of “sidedness” which is not beneficial to the employee or superintendent. Maintain a log of the discussion as well as completing the appropriate documentation. Both should be forwarded to Human Resources. These records SHOULD NOT be maintained on a project site unless authorized by HR.

It is essential that the conference witness understand the role. As well, he/she must understand that the information discussed is protected under privacy laws. Disclosure to unauthorized personnel is prohibited. Disciplinary procedures up to and including discharge will ensue.

Employee Records:

Changes to address, phone number, emergency contact, medical information, tax allowances, insurance changes or the like must be done through documents. Employees should be instructed to contact Human Resources or Payroll. An Emergency Contact document will be completed to change address, phone number, emergency contact, and medical information. Federal and state tax forms will be completed and returned prior to any changes in payroll. Insurance changes will not be changed until the appropriate carrier's forms have been returned, reviewed, and sent to the carrier/data is entered via the carrier's portal.

Employees who do not update address information are responsible for all costs associated with duplicating documents. If an employee has the incorrect address in the payroll system and his/her paycheck is sent to that address, he is responsible for the stop payment charge issued from the company's bank and any other charges associated with cutting a duplicate check. This same policy applies for any charges incurred by the company on behalf of an active or inactive employee. This includes but is not limited to tax documents, 401k/profit sharing documents, insurance documents, child support and other garnishments.

Note that employees should also maintain current addresses with our company-sponsored insurance carriers and 401k/profit sharing provider. This can be accomplished by contact via the internet, phone, or written letter. All current addresses were provided during enrollment.

Employee records are maintained in the Human Resource office. Only human resources personnel or corporate officers are permitted to retrieve records. Managers may view records as

determined by HR. Employees may review their personnel records upon written request to Human Resources.

Copies of employee records are forwarded to requesting agencies as dictated by state and federal laws. Other than government agencies or their contractors, all other records information must be forwarded to Human Resources using approved documents with verified signatures. This includes wage verification for loans, validation of health insurance coverage, employment status, and the like. Completed documents will be returned to the issuing agency and not the employee.

Only Human Resources will communicate information regarding employees' personnel information. Supervisors and managers should not provide reference information, answer questions, or discuss an active or inactive employee with police officers, state and federal agencies, private investigators, insurance representatives, attorneys, or potential employers. All should be referred to HR. When applicable, authorization will be provided prior to communicating information.

Hours of Work

Hours of work should be consistent on all Operations projects. This includes the fabrication shop and Service employees assigned as a subcontractor to Operations. The following schedule should be followed:

7:00 All employees are assembled at the designated location for 5X3 Safety/Production meeting. Employees arriving after 7:00 when the 5X3 starts are considered tardy. Meeting should last 5 minutes. Dismiss

*Note- Designated location should be close to work area as this decreases travel time to first assigned tasks. Should not be held in connex or field office, but rather at blueprint table or other designated area in the building.

7:10 All employees should be working at assigned tasks. There should be no lingering, going to vehicles, standing around. Exception will be Monday when Weekly Safety Training is conducted.

This will extend time from 7:10 to 7:20 (approximately)

9:00 Morning break. All employees should be instructed to begin break at 9:00 and be back at work tasks in 15 minutes. **Breaks are not mandated** by employment law and paid breaks are at the discretion of the company. Recall that employees not permitted to leave the project site during breaks. Those lingering past 15 minutes will be subject to "20-minute rule" meaning 20 minutes will be subtracted from the total hours worked. Later arrival equals more minutes subtracted.

9:15 All employees should be at assigned work tasks. They should not be walking to the area, but rather be there and ready to work. This should be monitored and documented as needed.

- 12:00 Lunch break. 30 minutes. Employees returning late will be considered tardy and recorded appropriately. Appropriate time will be docked from hours worked
- 12:30 All employees assembled at designated location for 5X3 Safety/Production meeting. Take attendance. Determine tardy/absent. 5 minutes. Location should be close to direct work area as to decrease foot travel time. Not held at connex or field office.
- 12:40 All employees should be working at assigned tasks. There is no lingering, going to vehicles, standing around.
- 3:25 All employees working an 8-hour day should meet for the final 5x3 Safety/Production meeting. Tool inventory, secure materials, secure site. Daily closure/shut down procedures should be monitored and verified by using a site-specific checklist.

Employees working a 10-hour day:

- 3:15 Afternoon break. All employees should be instructed to begin break at
- 3:15 and return to work tasks in 15 minutes. **Breaks are not mandated** and paid breaks are at the discretion of the company. Employees do not leave the site during rest breaks. Return to work tasks should be monitored. “20-minute rule” applies.
- 5:25 Final 5X3 Safety/Production meeting. Tool inventory, secure materials, secure site. Discuss tasks for tomorrow and ensure necessary tools and supplies are on hand. Daily closure/shut down procedures should be monitored and verified.

Service Division working on Operations projects or any construction project as a subcontractor will follow the above-mentioned schedule and rules. Service employees working on service calls will report breaks and lunch as required by the service coordinator and/or service manager.

Any deviation in this normal work scheduled **MUST BE APPROVED IN ADVANCE** by a division general superintendent or project manager.

Project schedules may force alternative start and stop times. However, the basic outline of the schedule should be followed. If a project start time begins at 11:00 PM, follow the timeliness of the schedule in order to maintain consistent expectations for all employees.

Deviation from expectations creates issues when employees are transferred from one crew to another. Employees should not be allowed to alter from the schedule set by the supervisors. Thus, consistency is a must.

Timesheets:

Timesheets must be correct – project, cost code, hours worked. Project cost codes will be provided by the project manager. It is beneficial to record information daily on the approved Timesheets rather than waiting until the end of the week. Errors cost your project and

accounting production time and money. Incorrect recording of hours worked will create problems. If an employee reports to work late, make sure that his/her hours reflect this. The same applies if leaving early. You must maintain accurate records; do not depend upon your memory. On sites with computers, an excel sheet can be used to daily record employees' hours worked. On other sites, a pocket time keeper can be provided.

Record the employees' first and last name. Nicknames will not be accepted. Enter the project name as directed by your project manager or general superintendent. Enter the cost code using only those provided for your project. Change Order or Work Order cost codes should be verified with Accounting prior to entry.

Record the hours worked daily using the approved, correct cost code. Your project loses hundreds if not thousands of dollars due to inaccurate time recording. Accuracy or inaccuracy is a reflection of your supervisory skills.

Note an Absentee Report should accompany a timesheet if assigned hours are missed due to missing the entire workday, arriving late at the start of the day or from break or lunch, or leaving early for the day or from break or lunch. **The exception to this being if the employee has previously submitted a Leave Request document.**

Although not mandated, it is beneficial to have the affected employee sign the Absentee Report as this makes him/her aware of the recorded absenteeism and notifies them that a report is being sent to the business office. An effective strategy used by some supervisors is requiring the employee to complete and sign the Absentee Report immediately upon returning from missed work hours. This serves as an accountability tool. If there is a discrepancy in recorded time and what the employee thinks he/she worked, it can be discussed at that time.

Employees must read the bottom of the timesheet. Mark areas as directed, sign and date the timesheet. If these areas are not addressed, the employee's paycheck will be held at our business office for pick up at 4:30-5:00 on Friday afternoon and may be received after the timesheet is signed.

Supervisors must complete timesheets prior to the end of the day on Friday (or the last day worked in the week). Thus, employees should approve, complete, sign and date timesheets during the last 5X3 Safety/Production Meeting and before receiving his/her paycheck. This allows for the completion of all required documents prior to the beginning of the next work week. As well, this eliminates the potential of an incomplete timesheet if the employee is absent or transferred to another project.

Production hours are wasted weekly due to timesheets being incomplete or incorrect. Excessive time spent dealing with project timesheets may be charged directly to your project. Incompleteness and inaccuracies cost as this re-work time effects the entire company.

Electronic timesheets or other electronic record keeping system may be present on projects. Instructions will be provided to all employees prior to use. Only the employee himself or herself is permitted to "punch in" with a ID card or other personal identification such as a

handprint. Employees violating this are subject to immediate discharge for cause as this constitutes fraud. Procedures will be implemented to assign cost codes.

Scope of Work:

Project managers and supervisors **MUST** know the project's scope of work. Review of the estimate, blueprints, and specifications are essential to understanding the work to be provided. Discrepancies must be noted immediately. RFIs will be generated. Work outside of scope increases costs, liability and frustration. Know the scope. If in doubt, do not proceed until obtaining approval from the project manager.

Change Orders:

These are the addition or deletion of work based on owner or owner representative's directives and approval. **DO NOT perform work on a change order** until approved by the project manager. Documentation is essential as this determines if payment will be made for changes. Verbal agreements are not valid.

Rework:

This is the result of incorrect installation, installation below accepted quality standards set by TAW, the GC or owner, or damaged work. Document all rework on DSFRs. Discuss repair of damaged work by others with the project manager prior to repair. Documentation including pictures is important. Rework = loss X 3. Quality control measures must be instituted with consistency during the installation to avoid costly rework. Review of installation procedures and acceptable standards should be discussed daily during 5X3 Safety/Production Meetings. Quality control is the responsibility of the on-site supervision team. Rework is reflection of the supervisor and the team. Employees with repetitive rework should be brought to the attention of the division general superintendent or project manager.

OVERTIME:

OVERTIME MUST BE APPROVED BY THE PROJECT MANAGER, DIVISION MANAGER, OR DIVISION GENERAL SUPERINTENDENT **PRIOR TO WORK**. There is no exception to this. Violation by any employee will result in a written Employee Warning. As well, continued violation after the initial written Employee Warning will result in non-payment of OT worked as governed by Wage and Hour rules and may result in immediate discharge for cause.

Supervisors who purposely stage work in an attempt to acquire overtime for themselves and/or employees are not doing themselves or their employees any favors. Rather they are hurting their projects and the company as a whole. Projects are bid with specific labor hours. Unnecessary overtime will result in labor liabilities charged against the project. This will effect your overall annual evaluation as well as that of your employees.

Intentional work slow down by any employee is considered a violation of company policy and can result in discharge for cause.

When overtime is necessary and has been **approved**, advise assigned employees as soon as possible. Assigned employees may or may not be on your current crew. The division general

superintendent or project manager will determine employees who will be considered for overtime work. Communicate directly if the overtime is mandatory or voluntary and the hours of expected work. Record this on your Daily Field Status Report. If mandatory, employees are expected to be present just like a regular workday. Disciplinary procedures should be instituted for those who do not report. Voluntary overtime is just that. However, if an employee states that he will report to voluntary overtime and does not, disciplinary procedures including an Employee Intervention or Warning should be implemented.

If for valid reasons not enough originally assigned employees can work overtime, immediately contact your division general superintendent or project manager. **DO NOT** make contact with other superintendents or employees to recruit for overtime hours. Labor needs and costs will be considered prior to assigning alternate employees.

Wage and Hour rules will be followed regarding overtime compensation. Employees with questions regarding overtime compensation should contact payroll.

Rest Breaks:

Wage and Hour laws do not mandate rest breaks for adult workers. These paid breaks are at the discretion of the employer. Note that an employee working 5X8 for a year is paid approximately 65 hours of wages for breaks. This increases to 104 paid hours for non-productive time when working 4x10. This number increases if employees are allowed to stretch break times.

Project superintendents and forepersons should set routine break times and ensure that employees are following these. Note the schedule provided previously under Hours of Work. Times should be systematic for the project with the normal morning break being 9:00-9:15, and the afternoon break being 3:00-3:15 if working a 10-hour day. All employees including supervisors are expected to remain on the project site during rest breaks. Employees are expected to stop work at the beginning of break time and have returned to work tasks no later than the end of break. Thus – stop work at 9:00 and be back to productive work tasks no later than 9:15. Supervisors must model appropriate behaviors associated with rest breaks. If an employee is working 5X8 hours, he/she is paid 1.25 hours of wages weekly for resting, drinking a soda, and eating a snack. This equates to approximately 65 hours of wages annually with no production in return. If one employee on your site overextends break by an extra 15 minutes a week, he now is going to get an additional 13 hours of wages annually for abusing a non-mandatory, company voluntary break system. Refer to information listed under Hours of Work in a previous section.

Rest break areas, especially in the hot months, should be established. These areas should supply shade and air circulation. These can be temporary structures or if permissible allow employees to remain in the building. Make sure that all employees are aware of the appropriate areas for break.

Employees are prohibited from leaving the project site during rest breaks.

It is the supervisor's responsibility to ensure that rest breaks begin and end at the appropriate time. This is established by following policies and not allowing deviation. Violations should be

dealt with using the company's Employee Intervention and Warning system. Allowing an employee to violate rest break policy will create other issues in the long run and is unfair to those who follow the policy. Stay stringent regarding rest breaks.

Superintendents, foremen/women, and leads are responsible for monitoring breaks and for setting the appropriate example. Under no circumstances should a supervisor abuse break times. This means employees in supervisory positions will remain on site and adhere to appropriate times. Disciplinary action will follow for not adhering.

Rest and lunch breaks are appropriate times for employees to use personal cell phones as the use of these is prohibited on projects and company facilities during assigned work hours. These should be used away from the immediate job/production area. Again, supervisors must stay consistent and fair with this policy. Supervisors choosing to ignore this are subject to disciplinary action. Those in supervisor positions must follow this policy as well. Personal calls on company phones or employee owned phones should be conducted during rest and lunch breaks.

Some projects will prohibit the use of cell phones, cell phones with cameras, or other electronic communication equipment. In this case, TAW will follow the protocol provided with all employees accountable. Violation will result in disciplinary action.

Lunch:

An unpaid lunch break should commence at 12:00 and end at 12:30 for all Operations projects unless an altered work schedule is necessary due to the project work assignments.

All employees should be free of duties during this time frame. Employees should be encouraged to remain on the project site during the lunch break. In some instances, this will be a requirement. Supervisors should not be the first out the door and the last to return from lunch as this model will be followed by all other employees. Supervisors are requested to remain on site and free of work duties during lunch breaks.

**In a statistical analysis that compared compensated hours versus production hours, the average worker who was compensated for 8 hours daily provided approximately 6.3 hours daily of measurable production. Obstacles to production included tardy arrival, early leave and late return from breaks, early leave and late return from lunch, nonwork-related conversation with co-workers, misplaced documents, tools and/or necessary equipment, personal telephone interruptions, supervisor interruptions, prolonged conversations regarding work/production, walking from one area to another, completing personal tasks during, sleeping and eating during work hours.

The point of sharing this information is help all understand the overall effects of non-productive time on your crew, on your project, on your company, and on you.

PER DIEM/TRAVEL

Per Diem and Travel expenses are established during the estimating phase of the project. Do not assume or communicate to employees per diem rates or travel until verified by a project manager or division general superintendent.

When applicable and as determined by the project and bidding procedures, courtesy vans will be provided as employee transportation. **It is important that employees understand that this is a courtesy and should be treated as such. Employees are not mandated to ride in a courtesy van.** It is important that employees riding in these vans understand they must follow company policies. Violations will be dealt with through the company's conduct system. Continued violations may result in loss of privilege and/or other employee discipline including discharge. Riders are expected to maintain a clean van by picking up debris at the end of every ride. Untidy vans will be parked until cleaned. Providing courtesy vans costs approximately \$40-\$75 per employee per week depending upon the number of riders and location of the project.

No tobacco products should be used on shuttle vans or company vehicles carrying more than the designated driver. No dipping, no chewing, no smoking. Violators will be issued an Employee Warning. Continued use will result in loss of driving/riding privileges up to involuntary discharge.

Shuttle drivers are expected to drive directly from point of origin to destination with no stops unless previously approved by a project manager or division general superintendent. This includes not stopping along the way to pick up riders, go to the store, or the like. Emergency stops are the exception.

Vans will remain at the project site(s) during the work day. They will not be used to transport employees to lunch or other errands. Employees with personal situations or those who become ill are expected to arrange alternative travel.

Shuttle vehicles should have a first aid kit and fire extinguisher. Van drivers are compensated for this duty. Thus they are responsible for maintaining a safe, clean van.

If appropriated, travel time will commence at 60 miles and paid at minimum wage. This is considered non-work time. Wage and Hours Laws do not mandate travel pay unless specific conditions are met. TAW 60-mile provision is above W&H requirements.

Per Diem is established based on the provisions of the project. Employees receiving per diem must remain in the assigned location of the project or forfeit per diem pay. Per diem will not be paid in advance, and will be paid according to work week completed. Employees who are absent from assigned work hours will not be paid per diem for that time.

AGAIN, do not communicate travel pay or per diem to crew employees until verified by the project manager or division general superintendent. Due to projects parameters, variances in travel pay and per diem will apply.

PERSONAL BUSINESS

Carrying and use of personal cell phones is prohibited during work hours except rest breaks and lunch. **Supervisors must model this by following this policy.** The use of personal cell phones during work hours leads to safety and production problems. All employees are expected to deal with personal business during breaks and lunch. Violations must be addressed in order to maintain fairness for all employees. Emergencies may be addressed differently. Supervisors are expected to monitor and maintain this policy as it creates problems when one supervisor does not adhere to it while others do.

Note that the family members and friends of some employees have tendency to communicate emergencies in non-emergency situations or to contact supervisors in order to relay non-emergency information to an employee. If this is the case, it is beneficial to hold a conference with the employee and explain that this behavior is creating a problem. Complete an Employee Intervention and forward to Human Resources. If it continues, contact Human Resources for directives.

Those assigned company-owned phones/radios are provided an Electronic Communication Policy. As with the above-mentioned usage, company owned equipment should not be used for personal communication during work hours except for breaks and lunch. As set forth in the Electronics policy, all personal usage should be limited. Data options such as texting, internet access, and similar are not packaged on all company phones. Before using, contact the Rick to ensure that features can be used without additional costs.

Personal business is just that – tasks that our not production related for the company. This includes completing personal documents, working on personally-owned vehicles parked at the project or near the project site, discussing the weekends' events, telling stories, eating, and the list goes on. Employees should be reminded that these tasks should be completed during non-compensated time or after work hours. Continued abuse of this policy should result in an Employee Intervention. If the behavior does not cease, then an Employee Warning should be issued. These behavioral patterns can lead to discharge for cause.

YOUR PAYCHECK

Wages/Salary:

Wages are determined, communicated, and verified prior to the first day of work. If an employee states he was told a different wage than paid, refer him to the division general superintendent or Human Resources. Do not state that “you will see what you can do”. Do not state that you will “get him that wage”. A memo is inserted in all orientation employees first paycheck envelope requesting that they verify that their name and wage are correct. Instructions are provided to report errors.

Employees are expected to receive their own paychecks. Paychecks will not be distributed to any other person without prior authorization by payroll. Under no circumstances will a paycheck be distributed to a relative or friend at the project site. Paychecks will not be kept on the project site if an employee is absent. It should be returned to payroll. Absenteeism should be determined during the first 5X3 and communicated immediately to the payroll clerk.

If an employee sends a relative or friend to get a paycheck from the office, written authorization must be presented along with valid identification. Paychecks not picked up by 4:30 on the scheduled payday will be mailed to the current address listed in the payroll system.

Lost or stolen paychecks are the responsibility of the employee. Costs incurred for stop payment and all other bank charges will be the responsibility of the employee. The employee should be instructed to contact Accounting. Employees who have not updated current addresses in the payroll system are responsible for checks mailed to the wrong address. The procedure listed above applies.

Paychecks should be distributed after 2:00 on payday. It is expected that paychecks not be cashed until the end of the payday. Employees selecting to cash early will be subject to reporting to the business office to obtain future paychecks along with appropriate disciplinary action. If direct deposit is instituted, information will be communicated to employees regarding date of accessibility to deposited funds.

Payroll Deductions:

Payroll deductions must be authorized by the employee except for those mandated by federal and state governments or contractors of these entities. Some deductions such as insurance deductions, 401k contributions, and the like are authorized at the onset of benefits and may not require it again.

Signed payroll deduction forms are generated by Accounting and provided for employee signature for tool purchase, uniform expenses, apparel purchases, loans/advances of pay, and other various purchases or expenses.

ALL TOOL PURCHASES INCLUDING BOOTS MUST BE PRE-APPROVED BY HUMAN RESOURCES. A Tool Purchase Request form must be completed, submitted and approved PRIOR to purchase. A Tool Purchase Request document will not be approved for purchases

under \$25.00. It is expected that employees purchase these items independently. Supervisors are not responsible for picking up these purchased items for employees. Supervisors not following this policy are responsible for the item purchased.

Safe Harbor Policy/Payroll Deductions:

If an employee feels that an improper payroll deduction has been taken, he/she should contact Accounting.

Allow the employee to speak directly to the payroll clerk for clarification. Do not engage in conversation with the employee regarding this matter.

Loans and Advances:

Superintendents should not request loans or advances on behalf of employees. Employees should be directed to contact Human Resources during break time or lunch and not during working hours to discuss.

Loans and advances are at the discretion of TAW. They are not guaranteed, and if approved will be limited. Appropriate documents must be signed prior to a loan or advance.

EMPLOYEE FRINGE BENEFIT PROGRAM

Employees who have questions regarding the fringe benefits offered, should initially be directed to the Employee Handbook and insurance certifications. If they don't understand the information presented or have continuing questions, refer the employee to Human Resources. Do not answer a question unless you understand the benefit and the policies associated with it. Providing incomplete or inaccurate information leads to problems for employees, you, and the company in general.

Company-Sponsored Insurance:

Orientation (full time) employees are sent insurance folders at least 2 weeks in advance of their potential insurance activation date. This folder is directly attached his/her paycheck along with a brightly-colored memo providing instructions and an insurance meeting time and date.

Employees should be released from your project site to attend this meeting. Sites out of Wilmington may need alternative meeting arrangements such as using telecommunications or having an HR representative conduct an employee meeting on site. Employees are compensated for this initial insurance information meeting. Employees are instructed in the memo to contact Human Resources if they can't make the meeting and alternative arrangements will be made. Additionally, an annual insurance renewal/open enrollment meeting is held in November for all employees as a means of providing information for policies effective 12/1 and providing an additional opportunity for enrollment.

Questions regarding coverage and completion of enrollment documents should be addressed with Human Resources. Supervisors are not responsible for completing enrollment documents or answering questions regarding coverage. Refer to HR.

Insurance certificates determine coverage. Certificates are made available by each carrier via the carrier's website or white paper by request. It is the employee's responsibility to review these prior to services. Each insurance carrier has informational websites which will aid in understanding policy guidelines. HIPPA rules limit the amount of information accessible by Human Resources. If necessary, HR will direct the employee to an insurance representative from our agent or the carrier.

Termination of employment due to discharge, resignation or ROF immediately effects insurance coverage. TAW's Termination Report has a section outlining coverage cancellation and Cobra continuation. Termination Reports are reviewed and signed by the terminated employee. Questions regarding coverage continuation or cancellation should be addressed by Human Resources through a telephone conference or meeting.

Workers Compensation/Safety/Accident/Incident Investigation:

Workers Compensation insurance is purchased from a private carrier which is currently Travelers. The amount of premium paid per employee is determined by trade classification, hours worked, and wages. The Workers Compensation system is regulated by the North Carolina Department of Labor and the North Carolina Industrial Commission. There are specific guidelines and procedures that must be followed in accordance with these government agencies.

A company's Experience Modification Rate, which is a statistical measurement based on the amount of claims dollars paid by the insurance carrier compared to other companies in the same classification, is used for several purposes. Initially a start up company has an EMR of 1.0. Based on claims dollars paid, the EMR will increase or decrease. The lower the claims dollars paid the lower the EMR.

A company EMR's is used in determining the next year's insurance premium. The higher the EMR, the higher the premium. The lower the EMR, the lower the premium. In addition, the EMR is used a standard measure of a company's safety rating. Established companies with an EMR over 1.0 may be prohibited from bidding certain projects.

Alternate accountability calculations are also requested during the pre-verification phase prior to being allowed to bid a project or qualify for a program. Information related to our DART (recordable) and CDAW (lost time) will be provided. These are effected by the number of injury claims recorded on our OSHA300 log.

From a personnel perspective, it is our goal to provide all employees a safe work place. From a business perspective, it is our goal in providing a safe work place to monitor and contain costs associated accidents and resulting injuries as they have an effect on every employee.

Issues related to recordable accidents associated with Worker's Compensation claims will be administered by Human Resources/Safety. However, detailed documentation of the incident/accident and resulting injury is a mandated component of the superintendent's or foreman's responsibilities.

Any and all incidents, accidents, and resulting injuries and/or loss of property meaning some type of monetary charge or potential of monetary charge will or may be levied must be documented. Immediately reporting these to the superintendent is clearly stated during the New Hire Conference, listed in the Employee Handbook, site specific safety training, and is reviewed numerous during 5X3 meetings and Weekly Safety Trainings.

However, it is the responsibility of the supervisor to ensure that all issues have been reported. It is suggested that you ask at the end of the last daily 5x3 if any employee has experienced an incident, accident, injury, occupational illness, been involved in property damage or witnessed any of these. Document this on the DSFR. This serves as an alternate route to ensure reporting compliance – even if the employee did not initially report as directed.

Clear documentation leads to appropriate medical attention and investigation. It also helps to determine the validity of the claim. **NOTE THAT SOME EMPLOYEES WILL POSITON THEMSELVES TO SET UP A CLAIM** regardless of whether the event is valid or fraudulent. Fraudulent claims require more time in managing than those that are valid as employees with valid claims are normally eager to return to work. In many instances, questionable or potentially fraudulent claims are more costly than valid claims as attorneys normally become involved.

The following documents should be on the project site:

First Aid Log:

This should be taped inside all First Aid Kits. Employees should be instructed to record as the log directs. Supervisors should review this log periodically to help determine repetitive types of injuries (ex. cuts) and measures to take to mediate these. This Log should be turned in to Safety at the end of a project for statistical analysis.

Incident Report:

One page document for recording near misses, incidents/accidents and injuries if there is loss of health that requires first aid, medical services beyond site first aid, loss of property, or impending monetary charges of any nature. Examples include an employee reports that he became overheated and is nauseous, an employee reports that she slipped off the last rung of a ladder but feels okay, employee comes in contact with a snake but is not bitten, employee reports that he hit a wall with a forklift, you see an employee back into a pole with a company vehicle, a crew member reports that an employee broke a ladder and tried to hide it in the dumpster, company vehicle accidents that do not result in employees having medical treatment, and incidents/accidents to other contractors' employees when TAW may have a responsibility/liability. **ANY TIME THERE IS A POTENTIAL OF LOSS of health or property.** If the employee, other contractors, general contractor brings an issue to your attention, you see the incident/accident, or another employee reports the incident/accident record it on an Incident Report. Near misses, sometimes referred to as almost accidents, should be recorded on this document as well. Contact Safety/Human Resources or division general superintendent to discuss and for directives regarding a post-accident drug test. Fax or send in with weekly paperwork the Incident Report for filing. Maintain a copy on site in a secure file. The information presented will be used to investigate and report the situation as well as to use in analyzing claims, projects, and the need for additional policies and procedures.

This document may also be used as to record employee behaviors that are suspect. An employee reports to work and is noticed limping after the first daily 5X3. When approached, he states that he twisted his ankle playing softball over the weekend. If an employee calls in stating that her back is sore and is not reporting to work. When prompted, she states that she has had back problems for years and sometimes it just hurts.

ART form:

Three-page document for recording accidents resulting in injuries requiring medical treatment at a company approved facility. This document is completed if an employee needs medical treatment above site first aid. All areas of the document should be completed as this is used for treatment and internal/external accident investigation. Safety must be contacted prior to transport to an approved facility/clinic. In emergency situations, call 911. Contact Safety as soon as possible. Superintendents or designated employees must transport injured employees to the clinic. Post-accident drug test will be performed. Clinics should be reminded of this when registering for treatment.

Supervisors should also document all particulars of the event and issues leading up to the event. This allows for a thorough investigation, appropriate communication with both our insurance carrier and treating physicians, and comprehensive claims documentation.

Completion of the ART form and additional documentation is VERY IMPORTANT. Field investigation is the first essential step in helping the injured employee, starting the accident investigation, and analyzing the situation.

Both Incident Reports and ART forms are used to complete an overall annual analysis in determining company safety, deficiencies, policy/procedure additions.

Driver's Accident Report:

In addition to the above documents, the DAR will be used when a company vehicle is involved in any type of accident resulting in a monetary loss or potential monetary loss. This could be as minor as bumping a pole on a project site to hitting another vehicle while backing out of a parking spot. If another vehicle is involved, the police or other authority must be contacted. A report should be provided and forwarded with the DAR to the business office. The division general superintendent and/or HR/Safety should be contacted immediately for instructions regarding post-accident drug testing, vehicle towing, and the like.

This document should be used if an employee's personal vehicle is involved in any accident that may create a liability such as scraping another contractor's vehicle. In these situations, both parties should be instructed that TAW does not take responsibility for personal property and the police or other authority should be contacted to issue a report.

IT IS IMPORTANT TO DOCUMENT AS MUCH AS SOON AS POSSIBLE AFTER ANY INCIDENT. Waiting for hours or days will cause problems. There is no such thing as "too much information" when documenting incidents, accidents, and injuries. Use additional sheets

as necessary. Write out the events, draw diagrams, write questions, provide as much detail as possible as this aids in the investigation. Be specific and leave emotions out.

If something does not seem right, it probably is not. Document, document, document!

Restricted Duty:

Employees experiencing a job-related accident may be placed on restricted duty which is also referred to as light or modified duty. TAW accommodates restricted duty either in the field, shop or office depending upon the restrictions and tasks of the job. A Restricted Duty Agreement is generated by Safety and presented to superintendent and employee for review and signatures. A copy is given to the superintendent, employee, and the original is maintained in the employee's WC folder. Employees on restricted duty should be treated fairly with no prejudice or discrimination. If an employee is not following the provisions of the RD Agreement, a conference should be held and an Employee Intervention issued. This serves as reminder of the importance of working within the stated restrictions. Superintendents are not expected to assign tasks outside of the restrictions listed. Employees on restricted duty are expected to follow the company's policies and procedures. RD wages are posted against the project on which the employee was injured. Worker's Compensation claims are protected under medical privacy laws and should be treated as confidential information.

Lost Time:

Lost time accidents result in the employee rendered incapable of work due to injury or illness. Lost-time accidents are costly and can lead to ratings, increased EMR, and litigation all of which costs your current project and the company time and money. All accidents increase the costs of future projects in the form of higher insurance rates. Pre-qualification packages, in order to bid projects, require disclosure of company safety statistics. Rates above acceptable standards, will lead to disqualification.

Most of all, the injured employee loses a week's pay prior to compensation at 67% of regular wages. No one wins with a lost time injury. A lost-time accident may qualify as FMLA leave with runs concurrently with the recorded time out of work.

No prejudice or discriminatory actions should be shown against an employee who has experienced an accident. Employees on or returning from RD or LT accidents should be treated fairly.

Mediation/Litigation:

A growing trend in Workers Compensation entails personal injury/liability attorneys becoming involved. TAW and our insurance carrier must hire legal council in order to defend against legitimate and fraudulent claims. If mediation is not successful, the case is heard by the North Carolina Industrial Commission. This process is time consuming and can last a period of years. The cost associated is heavy in many ways as the employee may not have a source of income during this time, medical services may not be provided as needed by any insurer, and the company must spend both time and money defending our position. No one wins.

Detailed incident/accident documentation and injury investigation are essential and begin with the superintendent, foreperson, and other field supervisors. Safety is the secondary investigative source after the incident/accident. Thus, the more detail provided in an initial report, the better for everyone.

Under no circumstances is the supervisor, foreperson, or lead to circumvent this procedure. Our goal is to provide immediate treatment as necessary and help the employee return to his/her position as soon as possible. As well, we must defend our position if there is concern the reported injuries are not valid.

Social Security:

Explanation in Handbook is sufficient

Leaves of Absence:

Employee should be directed to complete a Leave Request form and return to his/her supervisor. This should then be submitted to Human Resources. Leaves are granted for up to two weeks depending upon the length of employment, current status, and labor needs on projects. Human Resources will discuss the details of the request with the employee. Supervisors will be notified of the decision in a timely manner. If accrued PTO is available, the employee may substitute PTO hours for uncompensated hours.

Family and Medical Leave:

Employees who have missed three consecutive days of work or those who have missed a total of 3 work days intermittently due to personal health issues or those of a child, spouse, or other dependent or those who have informed you that they have current or future medical issues that will cause them to be absent should be reported to Human Resources. Eligibility for Family and Medical Leave is mandated by original act of 1993 with recent revisions. Eligibility will be determined by Human Resources. A thorough explanation is provided in the Employee Handbook. Refer applicable employees to Human Resources. Superintendents should not validate eligibility of protected leave or state that the employee will be subject to disciplinary action if they miss work until eligibility has been determined. **ALWAYS contact Human Resources** regarding FMLA.

Military Leave of Absence:

Refer employees to Human Resources

Military Reserves or National Guard Leave of Absence:

Refer employees to Human Resources

Paid Time Off:

Employees paid hourly are eligible for Paid Time Off which is referred to as PTO. Hourly compensated employees do not get vacation and sick pay in addition to PTO pay.

Note that PTO is an accrued benefit meaning that employees earn PTO hours each month of full-time employment. PTO accrual is calculated based on hire date for the initial year and

anniversary of hire date for subsequent years. A full month of employment must be completed in order to earn PTO hours.

Employees should be directed to the chart on page 19 of the Employee Handbook to determine the amount of potential PTO that can be accrued.

Length of Completed Service – informs as to the minimal amount of time of full-time employment in order to begin accruing PTO hours.

Monthly Accrual – indicates the amount of PTO hours earned for each month of completed full-time employment.

PTO Hours – indicates the amount of total PTO hours that can be earned/accrued during the work year which begins at the anniversary date.

For Example:

During the first year of employment, an employee begins earning PTO hours after the 91st day of full-time work. He will not actually earn hours until a full month of employment after the 91st day is completed. He will earn 1.778 hours per month for a total of 16 PTO hours (1.778 X 9 months)

Another example is an employee who has worked full time for 12 years. As determined by her anniversary date, she will begin earning 10.00 of PTO each month for a total of 120 hours or 15 (8 hour days) of PTO for the year.

Borrowing of PTO past accrued hours is a means of helping employees. It is not mandated as policy by our Employee Handbook. Employees must understand that borrowing hours is subject to approval by payroll. Terminated employees, for any reason, are subject to “pay back” of unearned/unaccrued hours of which is directly stated in our Employee Handbook. This is similar to pay advances as it provides compensation for wages not yet earned. As our payroll system does not record PTO hours on paycheck vouchers, employees should be encouraged to maintain a personal record of hours accrued/used. Simply writing this information on a calendar is the easiest method.

Leave Requests forms must be completed for requested leave in duration of two or more days. It is beneficial for record keeping purposes, to have employees complete a Leave Request form any time they have a planned absence. This helps maintain accurate records and provides validation that the time was requested as HR maintains these documents. Supervisors should submit Leave Requests 4 weeks in advance as arrangements must be made in order for crews to continue working. All other employees should submit 2 weeks in advance. There will be situations when this may not be feasible such as a family emergency, illness, or similar. Leave Requests should be submitted prior to the onset of leave. Requests may be denied if procedures are not followed or business needs prevail.

If a Leave Request has been completed and submitted, an Absentee Report is not necessary. Note that if an employee misses any assigned work hours (tardy, early leave, whole day absence)

either a Leave Request form or Absentee Report should be submitted. PTO compensation if applicable will be denied without documentation. Employees not following proper procedures may be denied PTO. It is not the responsibility of payroll to contact supervisors who do not turn in appropriate documents.

PTO is an overhead account. To record PTO on the weekly timesheet, write PTO and the number of hours requested for each work day. Recall that PTO is allotted in 2,4,8 hour increments. Job number and cost code are not necessary.

Holidays:

Holiday Pay is subject to eligibility requirements. To receive holiday pay, employee must be present the full workday or eligible for PTO for a minimum of 8 hours. If an employee only works a half day prior to a holiday and does not have PTO available to make a total of 8 hours, he/she is not eligible for holiday pay. If an employee does not report to work the day after a holiday and does not follow proper notification procedures, thus he is not eligible for PTO and is not eligible for Holiday Pay. Even if an employee notifies appropriately, if she does not have a total of 8 PTO hours for the day after the holiday, she is not eligible for Holiday Pay.

Employees are expected to report to work the day before and after a holiday. Leave Request documents should be submitted and approved to ensure availability of PTO compensation.

Holiday Pay is an overhead account. To record, write Holiday Pay on weekly timesheet. Number of hours should be recorded as 8 unless otherwise notified by division general superintendent. Job number and cost code are not necessary.

Bereavement Leave:

Must meet requirements of full-time with one year of consecutive employment. Bereavement Pay is based on meeting the criteria listed in the Employee Handbook. A Leave Request should be completed and submitted with documentation validating the request. Pay will not be approved if criterion is not met. Bereavement Pay is an overhead account. To record on timesheet, write Bereavement Pay. Number of hours recorded should be 8. Job number and cost code are not necessary.

Additionally, up to 3 days of leave is available. A Leave Request should be submitted prior to leave. PTO if eligible can be requested. If PTO is used, record as PTO hours not Bereavement.

Jury Duty Leave:

A Leave Request must be completed at a minimum of 5 days after receiving a jury summons. A copy of the summons should be attached to the Leave Request.

Eligible employees must follow the provisions of the Employee Handbook in order to receive compensation. A maximum of 80 hours of jury duty compensation at minimum wage minus any payments made by the court system is available per benefit leave year. Jury Duty is an overhead expense. Record as Jury Duty, number of hours recorded per day should be 8 unless documentation provided supports differently. Job number and cost code are not necessary.

PTO if eligible can be requested. Direct employees with questions to contact Human Resources.

School Involvement Leave:

Leave Request must be submitted at a minimum of 5 days prior to leave. 4 non-paid hours per calendar year are mandated by federal legislation. PTO if eligible can be requested. Employees with questions should be directed to contact Human Resources.

Education and Training Assistance:

Direct employees to read the Employee Handbook. Application for assistance must be submitted to Human Resources 4 weeks in advance of the course. This application can be accessed through written or verbal notification to Human Resources. Employees not following the guidelines provided are subject to disapproval of request. Employees who submit receipts for refund of education/training costs after the class who did not follow the application guidelines, will not be reimbursed. Employees who do not complete the training or don't provide documentation showing completion/passing, will not be reimbursed even if prior approval was granted during the application phase.

Company-mandated training such as QCM, First Aid/CPR, Safety courses, are not subject to the above-criteria. Employees directed to attend company-mandated training will be compensated for the time appropriated. Instructions for recording on timesheets will be communicated by the division general superintendent or payroll.

Profit Sharing/401k Plan:

Refer employees with questions to Accounting. It is better than you not explain or advise employees about the Profit Sharing/401k Program. A document entitled "T.A. Woods Company Profit Sharing Plan and Trust Summary Plan Description" is provided to each employee at the time of eligibility. A memo with directions and an information folder is provided to all newly eligible employees. Our current vendor TransAmerica has a website that provides valuable information.

Current participants and those previously eligible but not enrolled in the 401K component, will be provided documents quarterly providing an opportunity for enrollment, changing contribution levels, and investment strategies.

If a participating member's employment is terminated for any reason, he/she should be instructed to contact Accounting to obtain the appropriate documents for transfer or distribution of funds.

POLICIES AND PROCEDURES

Attendance, Absenteeism, and Tardiness:

Attendance is expected – meaning it is expected that employees report to work on time; that they work a full day; and, that they leave at the designated time after the final 5X3. Absenteeism costs the project and the company time and money. It is most important to document ALL absenteeism including early leaves, tardiness, and day absences.

A TAW Absentee Report MUST be submitted for any employee who misses any amount of assigned work time including early leave, tardy and full day absence (except if Leave Request submitted in advance). All sections of the document must be completed including:

- Header – employee name (legal name, not nickname), date of missed hours, message taken by, time of call in/report. If an employee notified the supervisor on a prior day, the date should be recorded. Note that time of notification is important to determine if the employee followed the minimum 1 hour call-in rule.
- The second block communicates the type of missed work time such as a full day absence, tardy, early leave. Note that the reason is also requested. This serves as a tracking device to determine other issues that may need to be addressed. For example, if an employee has a pattern of being absent on Monday and states that it is for personal reasons, a conference may be held with the employee to discuss the effects of this on the project and may lead to disciplinary action up to and including discharge.

The arrival and departure time if applicable should also be accurately recorded in order to check the accuracy of timesheets.

It is important to answer if the employee followed notification procedures by notifying the field supervisor or office. If this criterion is not met, requested PTO will be denied and may lead to disciplinary action.

Documentation should be submitted along with the Absentee Report for various absences including court dates, illnesses over 2 days in length, medical appointments, school involvement leave, etc.

Contact Human Resources for assistance.

- The third block is entitled “Disciplinary Measures Taken”. The information completed in header and second block will determine if a written Employee Intervention or written Employee Warning should be attached to the Absentee Report. **Note that if a verbal conference is held with an employee regarding issues related to absenteeism, the employee should sign and date the Absentee Report in the area entitled Discussion with Employee.** This provides evidence that a conference was held and the signature provides validation of this conference. This information may be used in future disciplinary action. If an Employee Intervention or Employee Warning is issued, the completed document should be attached to the Absentee Report.

This block also provides an area to mark if an Attendance Report is requested on an employee.

- The last section entails signatures and date from the person taking the message, such as a foreman and project superintendent.
- It is strongly suggested that you have the employee sign the Absentee Report. This helps create employee accountability.

All employees should be reminded to contact their supervisor in case of absence. It is important that ALL EMPLOYEES have the phone number of the appropriate supervisor. It is beneficial to post your company cell phone number in an area frequented by employees. This decreases the tendency to contact the business office and leave a message or to call the business office after start time. Some employees utilize this alternate reporting as a means of avoiding contact with a supervisor or evading the proper call in procedures.

If an employee calls the business office or division general superintendent to report missed work hours, an Absentee Report will be generated by the person taking the message. The absence will be reported to you as soon as possible.

NOTE: If an employee has previously turned in a Leave Request form, an Absentee Report is not necessary as long as the dates on the Leave Request coincide with the dates absent.

Unplanned absenteeism is of concern for both safety and production on project sites, in the fabrication facility, and service division. A strict stance in accordance with our policies must be taken. Superintendents and forepersons must stay consistent with policies. Inconsistency leads to the perception of favoritism, sidedness, and possible discrimination. As well, it creates issues when an employee is transferred to another project or supervisor. Remember fair treatment for all employees.

Employees who do not follow the appropriate notification procedures are subject to disciplinary action. Allowing this without addressing creates unfair treatment for those who report to work as assigned or those who do report as communicated in the Employee Handbook. Supervisors are not expected to contact employees who do not report to work or who do not report to work on time. There maybe an exception to this depending upon the circumstances. Contact the division general superintendent or HR to discuss.

Attendance violations including chronic or excessive absenteeism, lateness and/or early leaves, even when excused may result in disciplinary action. For example, an employee asks to leave early every Friday “because he has something to do”. This request should be declined as it is considered habitual absenteeism. The employee should be presented an Employee Intervention in a private conference to help him/her to stop this behavior that could result in eventual discharge. This same employee begins to come in late on Monday mornings “because he has car trouble”. An Employee Warning should be issued as a means of helping correct this behavior. The Warning is issued this time as it is a continued behavior, missed work hours, that was not

resolved with the Employee Intervention. If the behavior continues, even in a different pattern, the division general superintendent and/or Human Resources should be contacted for direction.

If an employee does not report to work or notify of absence for a minimum of 2 consecutive days, this is considered job abandonment and will be recorded as a voluntary resignation. Complete the appropriate Absentee Reports, notify your division general superintendent or Human Resources **immediately**, and follow the directions provided. If the employee arrives at the project site after the second day, he should be instructed to leave until a conference is held with the division general superintendent. A supervisor should accompany him/her to gather personal items such as tools. This should be immediately reported to the division general superintendent and Human Resources. The employee should be told to contact the business office for any further communication. If the employee becomes hostile or threatening, advise him/her that a call is being placed to 911 to report trespassing and disruptive behaviors. Under no circumstances put any TAW employee in danger by addressing this employee. Advise site employees to remain at their tasks unless told otherwise. If the employee poses imminent danger, all employees should retreat to a secure area. **Immediately contact TAW management** of the situation.

Approved Absences:

These normally approved in advance of the absence. This includes PTO, Jury Duty, Military Service Leave, School Involvement Leave (4 hours per benefit year), FMLA, and the like. Under normal circumstances a Leave Request is completed and approved prior to the commencement of the leave. If provisions are not followed, the leave will be considered unexcused and PTO if available will be denied.

Excused Absences:

These normally unexpected absences where proper notification procedures are followed. These include being sick, having a doctor appointment, and similar. If proper notification procedures are not followed, it will be considered an unexcused absence and PTO if available will be denied.

Unexcused Absences:

This includes; oversleeping, missing a ride, not reporting to work because the employee did not feel like it, OR not following appropriate notification procedures. This also includes not providing documentation of the absence when requested. Unexcused absences should be addressed through the company disciplinary procedures including Employee Interventions and/or Employee Warnings.

Tardy:

Considered as reporting to work after the start of the assigned work time, reporting to the assigned tasks late or returning from break or lunch after the designated time. The company's disciplinary procedures should be utilized to help the employee change undesirable behaviors.

Early Leave:

Considered leaving the assigned tasks or work site prior to the designated or instructed stop time, leaving early from break or lunch. Disciplinary procedures should be utilized.

The amount of lost production that is the direct result of “**missed work opportunities**” is **staggering**. Current research indicates that an employee who is paid for an 8.00-hour day normally produces approximately 6.3 hours due to numerous factors mentioned previously. **Supervisors must model desired behaviors in order to expect it.** Personal production by supervisors is essential for overall project success. Under no circumstances should supervisors arrive late or leave early to/from work, breaks, and lunch. As a role model, you set the stage for all production and safety. The old cliché’ “do as I say, not as I do” will not lead to efficient production and safety.

Employees are prohibited from leaving the project site during breaks. It is acceptable under Wage and Hour rules to enforce this same policy for lunch breaks as long as employees are freed from all work-related duties during the 30-minute non-paid lunch time. Supervisors (hourly wages) are expected to take a lunch break free of duties. It is advised that supervisors remain on site during lunch break.

Substance Use and Abuse:

All potential employees are provided a full policy document communicating the company’s policies on substance use and abuse. This document along with the information in the Employee Handbook and the review during the New Hire Orientation repeatedly covers our policy.

Supervisors are expected to be within close enough range at the onset of the workday, after breaks, and after lunch, and at the end of the day to detect usage of drugs and/or alcohol. Note that the daily 5X3 Safety/Production Meetings serve this role. Employees should be gathered not only to reinforce safety but also as to detect behaviors that are out of the ordinary including physical signs of drug and alcohol usage.

If you sense an employee is under the influence of, alcohol, illegal substances, or legal prescription drugs that alter perception through odor or observation of behaviors or there are signs of residual use, **CONTACT HUMAN RESOURCES immediately. If unavailable, the next contact should be your division general superintendent.**

Crew members should be encouraged to come to you in private to report suspected use during the work day or suspected residual use that affects the employee during the workday. Confidentiality must be maintained. Contact Human Resources for directives.

Under no circumstances should you allow the employee to start/return to assigned tasks. Ask him/her to wait in the project trailer, connex or other area with you until a manager provides directives or arrives on site. In this situation, you should also have a primary witness remain with you. The witness should be another superintendent, foreman/woman, lead person, or top mechanic. If the employee refuses, request that the employee vacate the site and advise that he/she is not to return until a conference is held with the division general superintendent or other manager. Contact a TAW manager immediately. Notify the general contractor, owner’s

representative, ROIC or other as directed. If the employee attempts to drive, call 911 and advise of the situation.

Maintain detailed records of the event as these will be provided to Human Resources. Information should include date and time of the event, a summary of the events and communication, those involved in the communication, and witnesses who observed the employee's behaviors and/or interaction. The primary witness (stated above) should also provide a detailed description of the events.

Dress Code:

Guidelines of the dress code are clearly stated in the Employee Handbook. Employees violating this should be addressed through a conference with documentation of an Employee Intervention or Employee Warning depending upon the circumstances.

Supervisors serve as role models of the company dress code. Dress appropriately and according to company policies.

Stay alert to employees wearing jewelry while performing tasks. As jewelry provides a safety hazard of conductivity, "pull in", "hook on", it is essential to remind employees to take off the jewelry prior to work. Information is provided in the Employee Handbook regarding jewelry. Site safety orientations state that jewelry is prohibited. Document repeated violations using Employee Intervention or Employee Warning documents. Supervisors should follow as well.

Piercings may create safety hazards. Contact HR for directives.

If an employee reports to the project site violating the dress code, do not allow him/her on site. Allow them to return home to change in order to be compliant. If they are riding a courtesy shuttle, they may remain in the shuttle or arrange transportation home. They will not be paid for this time. As well, documentation should be completed and forwarded to HR for filing in personnel folders.

Issues related to personal hygiene are sometimes difficult to discuss. Contact HR for directives.

Safety:

Safety is a priority. Unsafe production leads to accidents and injuries resulting in personal loss for the injured employee, loss of production, increase in costs, loss of future projects, and loss of profit. Accidents resulting in loss of health and loss of property have a direct impact on everyone.

Our motto of "Think Safety: Work Safely" is based on cognitive-behavioral psychology. If we think about safety, then our behaviors will be safer. Planning should occur as the project is bid, during the hand off meeting, and every day the project is active. Planning is the key to a safe project site. Proactive is safety working. Reactive safety is failed safety.

Daily 5X3 Safety/Production Meetings:

These are mandated for all project sites, fabrication facilities, service departments and warehouses. Recall that 5X3 should be held in close proximity of the work area with minimal non-production travel time to the first task.

START:

Of the workday – 5 minutes - discuss hazards of the site and remediation, complete safety checklists for ladders, equipment, harnesses/lanyards, and other, review AHAs for tasks to be performed that day, review MSDS of new chemicals, discuss tasks assignments, needed materials

RECONVENE:

After lunch –5 minutes- review site hazards, discuss new hazards, review tasks assignments, quality control measures

END:

End of the workday – 5 minutes -ask if anyone has any near misses, incidents/accidents, injuries, property damage to report, discuss site hazards and remediation, needed materials for the next day, completed tasks, quality control, ensure building, connex, tools are secure.

Daily 5X3 Safety/Production Meetings should be documented daily on the Daily Field Status Reports. Topics discussed should be listed in a concise format such as “Morning 5X3 – new excavation on site, discussed hazards and non-access area; Lunch 5X3 – found damaged ladder being used, review ladder safety and daily inspection procedure; End of Day 5X3 – needed materials for tomorrow, quality control showed problems in pipe runs, conducted hardhat inspection” The completion of daily 5X3s should also be validated by signing the appropriate section of the Weekly Safety Training.

Weekly Safety Training should be conducted on Monday at 7:00 AM on construction projects and the fabrication facility and at 8:00 for the Service Division unless working on a construction site. This can be accomplished by providing the information listed to the crew through reading it to them or asking a crew member to read the information aloud. Take care in ensuring that this is appropriate. All employees present must sign the document along with the supervisor’s signature. This validates that the meeting was held and the information presented. Specific safety training will be conducted by in-house safety, equipment vendors, or outsource safety vendors such as Good Friday Safety. Specific safety training must meet established guidelines.

All project sites, fabrication facilities, and Service Division must have a comprehensive copy of the company’s safety policies entitled “Field Safety Plan, Provisional”. All sites should have a 29 CFR 1926 OSHA Construction Industry Regulations manual, and federal/Army Corps of Engineers projects should have a EM 385-1-1 or the most updated version. These should be maintained and available for review. Other manuals may be needed depending upon tasks.

Hazard Communication:

In compliance with Hazard Communication standards, appropriate Material Safety Data Sheets for materials on site should be maintained at the project site office trailer, storage connex, or on smaller jobs in the supervisor’s truck. The sheets should be current and updated as needed

depending upon the substances on hand. If a MSDS is needed, contact Safety or the manufacturer or vendor. Our current insurance carrier, Travelers, has an extensive data bank of current MSDS. It is not sufficient to be able to access these via the website at the time needed. Rather, all MSDS for hazardous substances on site should be printed and accessible to all employees, contractors, and vendors on site. An updated substance list should be initiated, maintained, and accessible. Note that this will change as new materials and equipment are brought to the site. The substance list will direct the MSDS needed. Initiating and maintaining these standards are the dual responsibility of the site superintendent or foreman and Safety.

TAW's subcontractors must also follow the same Hazard Communication standards. This should be reviewed and verified. Copies of MSDS should be maintained on site and distributed as directed to the owner, GC, NAVFAC, or other authority.

Tool Safety/Security:

TAW spends tens of thousands of dollars annually purchasing, maintaining, and servicing company tools. It is essential that these tools be stored securely and inspected for safety prior to every use.

Company tools are transferred or purchased based on project needs. Tool purchases should be completed through the appropriate TAW personnel such as the shop administrator or division general superintendent. All company tools should be shipped or delivered to the shop prior to first use. The shop administrator will log, code, and mark with identification prior to sending the tool to the project. A tool transfer sheet will be signed by the superintendent or foreperson receiving the tool. This document will be filed. Project and company-wide tool inventory reports will be generated periodically for review and comparison to tools on site. Audits will be conducted by the shop administrator. Those assigned tools are held accountable for them.

Larger projects will normally have a tool budget inclusive of tool maintenance and service costs as well as the purchase of necessary company tools. Lost and stolen tools will break the tool budget quickly. It is essential that all company-owned tools are secure both during the work day and after. As projects sites differ, an appropriate method of tool assignment and return must be established. A check out/check in sheet is a simple yet efficient method. This entails an employee serving as an expeditor of tools by assigning tools. Each tool should be inspected for damage or neglect at assignment and again upon return. Information should be relayed to the superintendent.

Company-owned tools should be secured in a gang box equipped with an appropriate lock system. This gang box should be in a secure area of the site. When gang boxes are stored in a connex or office trailer, it is important to lock both the gang box and the connex. A security lock can be requested from the shop administrator for mobile storage units. TAW is not responsible for employee-owned tools left on a project site.

All company owned tools and employee owned tools must be inspected prior to use. Generalized and tool specific tool safety checklists can be provided by Safety. Damaged or defective tools whether employee-owned or company owned are prohibited and are not allowed

to be used. Company-owned tools in need of repair or service, must be tagged and returned to the shop. Record name, date, project, repair or service needed and attach tag to the tool. Follow instructions provided by the shop administrator.

Take note of repetition of damage to certain tools and/or by specific employees. If you note that a tool continues to be damaged in the field, review safe use practices to ensure that all employees are using the tool correctly. If you note that a specific employee continually damages a tool/tools, hold a conference with the employee to determine if he/she understands safe work practices. If you determine that the damage is purposeful or due to neglect, an Employee Warning is warranted. Continued neglect will result in injury and/or destruction of the tool. An employee given an Employee Warning will have to have retraining prior to continued use. This retraining can be supplied by a supervisor or vendor and should be documented on the Employee Warning.

Tool Transfer documents must be completed when a tool is purchased or transferred from one supervisor to another. If you allow a tool on your inventory to be transferred without the appropriate document, you are accountable for the tool.

A written tool request should be provided to the shop administrator 48 hours prior to needing the tool. This allows time for a review of tools available in the shop and other projects. You are prohibited from ordering/purchasing a company tool without authorization from the shop administrator or division general superintendent. If you do, consider it your personal tool and expense.

An inventory of company tools should be conducted daily. This ensures that no tools have been stolen or lost. In the case of theft, contact the police or other authority. A report should be submitted. All related documents should be forwarded to the shop administrator. Contact the shop administrator or division general superintendent immediately after determining there has been a theft. Note that most theft is an inside job, meaning that employees on the project are scouting potential tools during the day by watching what is secure and what is not.

Defective or damaged employee-owned tools are prohibited from use on project sites. The tools must be removed immediately. Upon return, it must be inspected by the superintendent or foreperson to validate the repair or service.

Equipment Safety/Security:

Similar procedures are expected for equipment on site. This includes company-owned equipment and leased equipment. Funds are spent in purchasing, renting, maintaining, and servicing equipment. Repairs to leased equipment are just as costly as repairs to company-owned equipment. It is essential that equipment be stored securely and inspected for safety prior to every use.

Equipment purchases or leases are charged against the project. Equipment requests and releases should go through the shop administrator. Be specific in what tasks need to be accomplished, type of equipment needed, and duration. Rental costs are effected by these factors. The shop administrator will negotiate terms and issue PO. 48 hours notice should be given for drop off or

pick up of equipment. Emergency needs communicate insufficient planning. Leased equipment should be inspected prior to signing. Do not just sign without inspection. A 10-minute inspection can save you problems. Company-owned equipment will be inspected prior to delivery and upon return. Damage, repair and servicing will be assessed against your project.

Projects will have an equipment budget. Misuse, not providing proper notification, allowing equipment to remain on site will increase costs and become a budget overrun. Ensure that operators are trained and show competency. Certain equipment such as forklifts, man lifts, excavation equipment, and the like require employee certification prior to use. This can be scheduled through the shop administrator or Safety.

Misuse, neglect, or intentional abuse of equipment should be documented using an Employee Warning. Due to the inherent safety hazards of working with equipment, there is no room for leniency. The employee is “grounded” until additional documented training is provided and recertification is issued. The employee can not utilize equipment until released by Safety.

Damage to structures, vehicles, completed work, and other property due to employee misuse of equipment will be investigated and documented immediately after the event. An Incident Report will be completed if injuries did not result. An Incident Report and ART form will be completed if the accident resulted in injuries needing medical care above site first aid. Be as detailed as possible. Supervisors are the first phase of accident investigation. List all witnesses by name and contact information. Obtain verbal and written account of the incident. Contact Safety immediately. If not available, contact your project manager or division general superintendent for directives. The employee will be drug-tested at a company-approved facility immediately following the incident and should be driven to the facility by the superintendent or foreperson. No exceptions.

Material Safety/Security:

Material safety and security is of increasing importance. Ensuring that materials are stored safely and securely hinges on being on your game.

As materials are delivered, take inventory. **This is a must.** Compare material order on PO to that delivered. Note discrepancies on the delivery ticket and/or pick ticket. If wrong items delivered, defective items delivered, wrong number of items delivered/shortage, document on DSFR. If material delivery will impact work schedule especially critical path, contact project manager immediately and document.

Materials should be stored in a secure area with a control method to deter theft. Theft of materials is rampant. This includes break ins, other subcontractors, and TAW employees. Purposely cutting copper tubing too short and then putting it in a work glove daily at the end of the day to take home is material theft. Stripping wire and salvaging the copper for personal gain when TAW purchased it is material theft. Theft of tools and materials occurs every day on every project.

If you observe or are told that an employee is stealing tools or materials, contact Human Resources. Directives will be provided.

If your project experiences theft due to a break in, do not allow entry into the area. Call 911 or other authority as directed (such as military police on DoD projects) to report the theft. Next contact your division general superintendent or project manager. Be accessible when the police arrive. Return all documents provided to the business office as soon as possible. Stay observant and listen as break ins are usually executed by those who are familiar with the project site.

Materials must be stored in a safe manner. All storage containers, warehouses, and structures used for storage must have walking/carrying access from the front to the back. No employees should have to climb over obstacles to get needed materials or tools. Stairways with railing are required if the storage container is raised. Stacked materials should be cradled using bracing. Storage areas should be equipped with a fire extinguisher. Shelving may be constructed. Flammable or combustible materials should be stored according to MSDS. Refer to TAW Safety Policies.

Site Safety Orientation:

This is a MUST. When TAW works as a subcontractor, the general contractor or owner's representative will conduct a site safety and health orientation. In most cases this is mandatory in order to get access to the site. All TAW project sites should have a stand-alone safety/production orientation for all new employees to the site. This should be completed the first day on the project and documented with the employee's signature. As each site is different, the project superintendent and Safety will create the safety orientation after a hazard analysis has been completed and reviewed. This should be accomplished prior to any employee beginning work.

If there is a TAW's subcontractor, these employees should also participate in site safety orientations conducted by the GC and TAW (if applicable).

Subcontractor Safety:

This must be monitored. Subcontractors to TAW are responsible for all the same safety criteria we are. They should conduct site safety meetings, have written safety policies, train employees, have accident reporting/investigation procedures, and the like. Report subcontractor safety issues to Safety, division general superintendent or project manager.

Safety Checklists:

Will be provided for projects based on tasks performed. These checklists should be completed daily and maintained in a notebook or file on the project site. Periodic review of these will be conducted during site Safety Audits. The checklist may include the following:

- General Daily Safety ...
- Ladders
- Lifts
- Scaffolding
- Harness/Lanyards
- LOTO
- Air monitoring
- Confined Space/Permit Confined Space

- Equipment – specific to project
- Tools

The checklists should be turned into the project manager at the end of the project. These will be filed as project documents.

Certification and assignment as a Competent Person or SSHO:

This is mandated for specific projects sites and work tasks. SSHO entails OSHA30, first aid, and CPR certification. Competent Person certification is normally achieved through a class and passing a proficiency test. CP certification is normally required for excavation/trenching, confined space, ARC flash/LOTO, Haz/Mat, scaffolds, fall protection, bloodborne pathogens, and possibly others dependent upon the project tasks. Note that some state licenses or journey level licenses can be substituted for these CP certifications.

Original certificates are maintained by Safety. Copies are scanned and maintained in electronic files for inclusion in project documents. A hard copy is to be maintained on the project site and accessible at all times.

Certification must be renewed based on the provisions of the original certification. A master list is maintained in the business office. However, it is a good idea to periodically check expiration dates in order to have the appropriate training scheduled.

Incidents/Accidents/Injuries:

Discussed previously, review again

Any and all incidents, accidents, and resulting injuries and/or loss of property meaning some type of monetary charge or potential of monetary charge will or may be levied must be documented. Immediately reporting these to the superintendent is clearly stated during the New Hire Conference, listed in the Employee Handbook, quoted during specific safety training, and reviewed numerous times during the 5X3 meeting.

It is the responsibility of the supervisor to ensure that all issues have been reported. It is suggested that you ask at the end of the last daily 5X3 meeting if any employee has a near miss, incident, accident, injury or property damage to report. Document this on the DSFR. This serves as an alternative route to ensure reporting compliance – even if the employee did not initially report as directed.

Clear documentation leads to appropriate and quick medical attention and thorough investigation. It also aids in providing information to the insurance carrier to help review the claim. NOTE THAT SOME EMPLOYEES WILL POSITION THEMSELVES TO SET UP A CLAIM regardless of whether the event is a valid work injury or not. Fraudulent claims require more time in managing than those that are valid as employees with valid claims are normally eager to return to work and compliant during alternative work assignments. In most instances, questionable or potentially fraudulent claims are costlier as more time is required, additional personnel become involved, the insurance carrier requires additional documents, and legal council is engaged. It is estimated that over 10 cents of every dollar paid toward insurance premiums is used in dealing with fraudulent claims. Therefore, if you believe there are

suspicious issues such as late report, indirect report, no witnesses, or similar it is important to document and forward this documentation to Safety. Foremen/women and leads should be instructed to report these situation immediately. Upon review, Safety may request additional information.

The following documents should be on the project site:

First Aid Log:

Should be taped inside all First Aid Kits. Employees should be instructed to enter information as the log directs.

Incident Report:

One page document for recording near misses, incident/accidents not requiring medical treatment of any type, incidents/accidents and resulting injuries when there is a loss of health that requires first aid, medical services beyond site first aid, loss of property, or any type of impending monetary charge or loss. Examples include:

- Employee reports that he slipped in the mud and feels some back pain
- Employee reports that she tripped on a pipe in the hallway but is okay
- Employee reports that he came with a substance and is itching
- Employee hit a beam with an aerial life and caused damage to the lift
- A TAW employee reports that an employee purposely damaged a tool and threw it in the trash bin
- An unauthorized employee uses a company vehicle to drive across the site and in doing so, hits a rut causing front-end damage.
- A TAW employee becomes engaged in a physical contact with another site employee and is pushed to the ground
- A vendor backs into a TAW vehicle parked on site

An Incident Report must be completed **ANY TIME THERE IS A POTENTIAL FOR LOSS OF HEALTH, PROPERTY, OR MONEY.**

If the effected employee, another TAW employee, subcontractor, general contractor, owner's representative brings an issue to your attention or you see the incident/accident, complete the Incident Report. Near misses, sometimes referred to as almost accidents, should be recorded on this document as well. Contact Human Resources or division general superintendent to discuss and for directives regarding post-accident substance testing. Fax or send the completed Incident Report to HR for immediate review. Maintain a copy on site in a secure location. If this is not feasible, a copy will be returned to you.

The Incident Report may also be used to record employee behaviors that are suspect. An employee reports to work and is not using his right hand to perform tasks after the first 5X3. When approached he stated that he got into a fight over the weekend and hurt his hand. After completing the Incident Report, contact your division general superintendent or HR. Note that employee sustaining personal injuries cannot return to work until cleared with no restrictions by a treating physician. Documentation must be presented.

ART form-Accident Reporting and Treatment:

Three-page document for recording accidents resulting in injuries requiring medical treatment at a company approved facility. This document is completed if the employee requires medical treatment beyond site first aid or if directed by management. The supervisor should complete the top section of the ART form entitled:

Part 1: Supervisor's Report of Injury by requesting the information from the injured employee. The bottom section is completed by the initial treating physician.

Part 2: Accident Investigation is also completed by the supervisor. Each section should be read, investigated, and completed. Sections 1-5 concentrate on the possible reasons for the accident/injury. The bottom section addresses remediation of the event so that it does not happen again.

Part 3: Employee Statement is completed by the employee as soon as possible after the accident.

Accurate completion of the ART and detailed supplemental documentation by the superintendent is used for treatment review and internal/external accident investigation. Supervisors should maintain notes covering all of the event and issues. It is better to record too much than to not record enough.

Safety must be contacted prior to transport by a supervisor or designated employee to an approved facility/clinic. Facilities should be reminded of our mandatory post-accident substance testing when registering for treatment.

In emergency situations, call 911. Contact Safety/HR as soon as possible. If not available, contact division general superintendent or project manager.

Verbal notification should be made immediately to TAW Safety. Contractual reporting requirements to general contractors, owners' representatives, NAVFAC, OSHA, insurance carriers, and similar must be met. Specific time allotments differ for each agency. Therefore, immediate verbal report is essential. Documents must be presented ASAP in order to remain compliant and to start the investigation process. NVFAC is implementing a new computerized reporting system. Once operation, instructions will be provided.

Utilize near-misses, incidents, and accidents as a discussion topic for the next 5X3 immediately after the situation has been resolved. Discuss the event, hazards that lead to the event, loss of health or property, and the safety measures in place to avoid this type of event in the future. Do not mention the employees' name(s) involved in the event. Rather concentrate on recognition of the hazards and controlling the hazards through safety guidelines and rules so that similar events do not occur in the future.

Visitors:

Non-employed visitors such as inspectors, vendor representatives, applicants, and those trespassing should be directed to the general contractor's office trailer for check in. Do not get into a confrontation. Simply state the rules of the site. If they are not compliant, inform the general contractor's or owner's representative. If TAW is working as the prime contractor,

instruct the visitors that they must check in. Trespassers should be asked to leave. Do not engage in a confrontation. If the trespasser does not leave when requested, contact 911 on non-federal sites. Contact military police or other as directed on federal sites.

Federal OSHA inspectors, NCOSH inspectors, NAVFA inspectors and the like should present documentation prior to entering a site. OSHA and NCOSH inspectors should state the type of inspection and provide you time to contact TAW Safety, division general superintendent, or project manager. A preliminary conference should be held with contractors involved in the inspection. We have the right to “walk” with the inspector during the inspection. We may take pictures and request documentation/evidence of violations. Immediate correction of violations is permissible upon request. At the end of the conference, a closure meeting should be held to discuss findings. Take notes, ask questions. Gather all documentation provided and forward to TAW Safety. NAVFAC inspections both safety and quality control are at the discretion of the agency. Immediate correction of violation if applicable is expected. Request a closing conference with the inspector to review information documented. Request a copy of the evaluation document for review and comment. Immediately forward all to the business office.

If a general contractor or CM informs you of an inspection, request a “pre-inspection” conference in order to discuss areas of concern. This provides you and the GC or CM the opportunity to share comments and prepare for the inspection. Contact Safety upon learning of this type of inspection.

Personal Injury:

Employees sustaining personal injuries outside of the work place cannot return to work until cleared with no restrictions by the treating physician. Contact HR for directives as this may also entail FMLA leave, Leave of Absence, and/or a STD claim.

Personal Protective Equipment:

Employees who arrive on site without assigned PPE should not be allowed to work on the project site, in the fabrication facility, or on service calls. There is no exception to this rule. The employee should be advised to return with the assigned PPE. Employees are not compensated for time spent retrieving PPE or non-production time spent trying to find assigned PPE

Mandated PPE which is allocated at hire:

Hard hat – Company hard hats will be worn. Employees wearing those not assigned by the company will be considered in violation of this policy. This includes supervisors and project managers. Hardhats will be worn with the bill facing forward. Exceptions may apply during welding tasks.

Safety glasses and/or goggles – Company will supply ANSI approved safety glasses, goggles and face protection. Employees may use personal eye protection as long as it meets the minimum ANSI standards for the tasks assigned. Sunglasses are prohibited as use as safety glasses. TAW is 100% eye protection/safety glass – means all the time; no exceptions. Employees wearing prescription lenses must have approved shatter-resistant lenses and side shields or wear protective over glasses which are provided by the company.

Hearing protection – Employees are provided several pair of temporary plugs. If other hearing protection is needed, Safety will assess the work environment and determine the appropriate protection.

Hand protection- Employees are provided a minimum of 2 pairs (mechanic and leather) at hire. Welders will also receive additional mig/tig/stick gloves. Service employees will receive additional task-based gloves as needed. It is expected that employees wear appropriate hand protection as determined by tasks where cut, tear, rip, puncture, abrasion burn, or exposure may occur or at any other time directed. Hand protection should be worn all the time. Specific contracts may mandate 100% hand protection.

All employees working on project sites, in the fabrication facility or service calls are expected to wear protective-toed boots or shoes. (not provided by TAW). These should be steel-toed or other approved protective-toed with a skid-resistant, puncture-resistant soles. Specific work tasks may deem other requirements.

TAW will provide vouchers for local Red Wing stores. This entitles the employee to a discount and systematic payroll deduction for purchases. Supervisors are not responsible for issuing or requesting vouchers. A Tool Request form must be submitted and approved prior to a boot voucher being provided.

Other PPE such as nuisance masks, face shields, respirators, reflective vests will be provided to employees as required. Task hazards will be assessed by the superintendent or Safety and appropriate PPE will be issued to employees.

Superintendents, forepersons, and designated leads must conduct periodic inspections of assigned PPE including personal work boots. This can be accomplished during a weekly 5X3 Safety/Production Meeting. PPE in violation of safety policies should be noted and replaced. Employees who have lost equipment, neglected or destroyed equipment will be charged for replacement through the payroll deduction system. Payroll deduction documents will be forwarded for signatures. Supervisors should communicate with Safety for replacements. Employees with work boots/shoes in violation should be given an opportunity to purchase replacements. This should occur as soon as possible, but before the 5th day after notification.

Worn PPE or outdated PPE which was originally issued by TAW will be replaced by the company.

Supervisors should make daily PPE accessible while maintaining employee accountability. This accountability system should be established such as a “check out sheet” which notes the employee’s name and PPE provided. This can be accomplished during daily 5X3s. Supervisors should take note of employees who consistently check out items such as gloves and safety glasses. A conference may be held to determine the cause of this. Although single items are not a major cost to a project, weekly replacement of \$4.00 a pair safety glasses and \$6.00 a pair

gloves can be come a burden both in means of time and expense. Employees are expected to maintain company issued PPE.

Neglect, purposeful damage, and other abuse will warrant assignment of new PPE at a direct replacement cost to the employee. Contact HR for replacement cost. Complete a Deduction Sheet and have employee sign, and forward to Safety. The appropriate deduction will be completed during the next issued paycheck.

Assigned harness and lanyards should be issued through a documented check out procedure to employees daily. Company-owned harness and lanyards should remain on site. All harness and lanyards, company owned and employee-owned, should be inspected before every use. The inspection should include the completion of an approved checklist which should be filed at the project site. Note that harness and lanyards must have manufacturer tag's attached and manufacturer's date or date of inception (first used) should not exceed 5 years. A log is maintained by the Shop Administrator of put into service dates. Harnesses and lanyards should be stored appropriately by hanging. They should not be thrown on the floor or in a tool box. Retractable and life lines should be stored in secure area of the connex or site trailer. Replacement costs associated with lost, stolen, or broken fall protection will be charged directly to the project.

Employees requiring respiratory protection must be fit tested, trained, and break tested using the specific equipment provided. This is conducted by a corporate physician and/or outside vendor. Note that double banded nuisance masks and masks with carbon filters are considered respiratory protection on federal sites. Use of these require the above-mentioned procedures prior to use.

Tobacco Use:

We offer a tobacco-free environment. There will be no smoking, dipping, or chewing in office areas including mobile offices, fabrication facilities, warehouses, temporary storage such as a connex and any other place where groups of employees meet, work, or travel through.

Use of all tobacco products is prohibited in any company vehicle used for shuttling employees. This includes vans and trucks, owned or rented by TAW.

Use of all tobacco products is prohibited in any area designated as such. Using tobacco products in these areas is considered a policy violation and will result in employee discipline in the form of an Employee Warning. Continued violation may result in employment termination. On zero tolerance project sites, violation of tobacco policies will result in immediate discharge for cause.

Tobacco use is considered personal, non-productive time. Tobacco use should only occur in designated areas during break times and lunch. Employees leaving work areas to smoke other than these times or employees stopping production tasks to smoke will be considered in violation of company policy. Supervisors should state this policy clearly and maintain it. Allowing one person to violate it creates discrepancy for all others. Maintain a stringent protocol for this non-

productive, personal time. Supervisors must model this. Leading by example is the best type of leadership.

Electronic Communication/Telephone:

IMPORTANT. Only employees with company-owned communication equipment are permitted to carry this on the project site or business office during work hours. All personal communication equipment should be stored away from the direct work areas. This should be consistent from project to project and division to division. Inconsistency leads to confusion for employees.

Personal communication is non-productive, personal time. Allowing employees to carry and use personal communication leads to safety and production issues. Employees should be permitted to use personal communication equipment during breaks and lunch.

Supervisors, managers, and any employee with company-owned equipment should model this policy by avoiding personal communication during production hours.

This policy applies to landlines as well.

All employees regardless of time are prohibited from making personal phone call at company expense. Expense includes the direct costs related to the call whether on company landlines or company cell phones as well as the lost production time during the call. Initially an Employee Warning will be issued with mandated repayment. Subsequent violations will result in employee discharge.

Employees should be periodically reminded of this policy during 5X3 meetings. When new employees enter the project site, this should be discussed during the orientation.

Supervisors should stay firm and consistent with this policy. Violations should be handled using TAW's disciplinary policies.

Information Systems- internet, voicemail, email:

Detailed explanation in the Employee Handbook.

Basically stated, TAW owns all documents, records, and communication generated by computers, phones, voicemail, and any other form of information system and/or business documents generated on TAW computers and other computers are the property of TAW. TAW reserves the right to monitor all communication and documents as TAW owns all equipment and software licenses.

TAW views all communication on its Information Systems as business related and not for personal use. Thus, no employee should use these systems for private communication such as personal emails, internet access, personal photographs, cell phones and the like. Deleted content can be accessed. There is no expectation of privacy associated with any information on the

Information Systems provided or made available by the company. TAW management does and will continue to monitor data on company-owned Information Systems.

If a password is assigned to you, do not share this password.

Protect Confidential Company Information:

Keep company information confidential and private. Maintain a secure system for project documents. Share only documents approved by management. Understand that information stored, saved and transferred using electronic mail, voice mail, computers, internet, and the like is not secured;

Keep It Professional: T.A. Woods Company's Information Systems are for business purposes, not personal use. Any and all policies of TAW are in effect when using the company-owned Information Systems.

Do Not Solicit: Don't solicit employees, vendors, or others for personal gain using TAW's Information Systems.

Abide by Copyright Laws: No copying or transmitting of copyrighted materials.

Keep Your Personal Use of Communications Separate: Do not use personal computers or personally-owned information systems to transmit T.A. Woods Company's information.

Social Networking: No Facebook, myspace, or any other social networking for personal use during production hours.

Personal Property: Includes employee-owned items in company business offices, in company vehicles, in personal vehicles parked on company property or project sites, on project sites or any other area or location associated with TAW work. As there is no means of true security, TAW is not responsible for any personal items. Employees selecting to leave tools in company storage, tool boxes, in the fabrication facility or other areas do so at their own risk.

If an employee reports that his tools have been stolen, he should be instructed to contact the police or appropriate authorities and file a report. Same applies for damage to his/her vehicle or any other personal property.

Solicitation: By people not employed with TAW is not allowed on company property which includes project sites, parking lots, and any place we do business **during paid work and break times**. It does not apply to non-paid lunch breaks or before/after lunch. Solicitation may come in the form of other company's soliciting employees or possibly union representatives wanting to talk to employees. The owner of the property, owner's representatives or the general contract may have specific rules regarding trespassing and the like. Contact Human Resources for directives.

Distribution: This normally goes along with solicitation. Non-employees are not allowed to distribute materials on company property or project sites for any purpose. Employees can't

distribute materials during paid production or break times or when they may interfere with the work of others. Employees can't distribute material at any time in work areas.

Conflict of Interest: Read carefully in Employee Handbook. Basically saying employees who show disloyalty, disruptive, competitive, or damaging behavior against T.A. Woods Company are subject to disciplinary action up to and including termination.

Ex-employees who display this type of behavior in a harassing way, are subject to legal action (ex. Discharged employees at WCC).

Don't accept gifts of value, loans, or special consideration from vendors or those trying to seek favor. If approached, contact your general superintendent to discuss. Understand there is a difference between an equipment vendor treating your crew to pizza for lunch and him/her telling you that he'll put you in a beach house for the weekend.

All employees are prohibited from "promising something" in exchange for favor.

Emergency Plan:

Understanding and communicating T.A. Woods Company Emergency Plan is important. Refer to Field Safety Plan; Chapter 4 Emergency Action for Plan for specific information for types of emergencies.

Site specific Emergency Plans will take precedence over general plans. Site supervisors should notify managers immediately of any and all types of site emergencies and action taken thus far by owners, owner reps, or GCs. If TAW is the controlling contractor, immediate contact must be made with a T.A. Woods manager. In emergency situations, lend your attention to containing the emergency and instruct another TAW employee to make contact.

DO NOT SPEAK TO ANY MEDIA SOURCES. Do not provide comment or discuss the emergency situation. All crew members should be reminded of this. Communicate with approved people or sources only.

Weather emergencies and work plans are dependent upon the weather, travel conditions, site conditions, and owner or GC directives. It is important that information be communicated AFTER provided by management. Do not assume that a project will or will not close.

Directives will be provided as soon as possible. It is important to communicate this to all crew members in a message that is clearly understood. Ensure that all are present and hear the same message. It is imperative that all employees have the superintendent's, foreperson's, and lead's company cell phone number. As stated earlier, this should be posted in an area frequented by employees.

All employees should be reminded that if TAW is working, they must use their best judgement in determining if to report to work during emergencies. However, not reporting does not eliminate the responsibility of following call-in procedures.

Company Vehicles:

Only authorized drivers drive, period. This includes driving on a project site, laydown yard, and any public or private roads. A Company Vehicle Use policy and current NCDMV records must be reviewed. This along with additional review by our current vehicle insurance provider is mandated. Only Human Resources can approve an employee to drive.

All company-authorized drivers have an added obligation of driving safely as our vehicles serves as moving billboards with a telephone number. Call in complaints will be investigated by Human Resources and appropriate action will be taken.

All authorized drives must immediately report all traffic tickets, loss of driver's license for any reason, conviction of crimes as they relate to driving, and anything else that would affect approval to drive a company vehicle. Our insurance carrier has become more pro-active in assessing risk of drivers. Employees with conviction of major crimes or a series of lesser offenses over a period of time will be eliminated from the approved drivers list. For example, though an employee may only lose his/her license for a year after a DUI conviction, it is normally a 3-year time frame from point of deposition before he/she can drive a company vehicle. This may be longer or never depending on previous citations.

A new procedure involves our shop administrator documenting and taking photographs prior to the assignment of a vehicle. There will be periodic review of the overall condition of the vehicle. Negligent, abusive, and/or non-reported damage will be the responsibility of the assigned driver.

ALL COMPANY VEHICLE INCIDENTS, ACCIDENTS, NEAR MISSES, THEFT, DAMAGE MUST BE REPORTED IMMEDIATELY TO SAFETY OR A DIVISION MANAGER. Remember field supervisors are the key to appropriate accident investigation. Follow the procedures listed previously. An Incident and/or ART form along with a Vehicle Accident Report must be completed. Additional documentation that will help the investigation should be included. Drug and/or alcohol testing is mandated as soon as possible after the accident but under no circumstances over 2 hours after the event.

T.A. Woods Company will be implementing a GPS navigation/monitoring system in the near future. This will provide an additional safety tool as well as an array of monitoring devices to ensure fuel efficiency, direct routes to project sites, locating stolen vehicles, communicating repair or maintenance issues.

All company drivers should travel the direct route to the assigned projects. Picking up employees is prohibited unless previously approved by a project manager or division general superintendent. Under no circumstances should a deviation in the most direct route to the project be taken to accommodate an employee preference.

Only TAW employees are permitted to ride in company vehicles. No exceptions. No company vehicles are to be used for personal transportation or non-company related work.

The use of a company vehicle such as the box truck must be preceded by signing an usage agreement. This can be done through Human Resources.

Any employee assigned a company vehicle is expected to complete a weekly vehicle inspection sheet. Incomplete sheets are not acceptable. This allows for tracking of needed maintenance and repair.

Note that the average cost to operate a company vehicle ranges from approximately \$6,000 to \$10,000 annually. It is expected that assigned vehicles be treated with care.

Damage as a result of negligence, abuse or as the result of being involved in an incident/accident is considered the driver's responsibility.

Company vehicles are expected to be maintained in clean, working order. Vehicles not maintained as such will be parked until conditions are met.

All policies associated with TAW's fleet vehicles are necessary to reduce risk.

Standards of Conduct:

Rules and policies help create fairness and equality in the workplace. Without them, employees' behavior would create many issues. Our goal is to help the employee identify problematic behaviors and change this behavior. A systematic approach using Employee Interventions and Employee Warnings is used in this process. Ultimately it is up to the employee to change problematic behaviors or to disciplinary consequences up to and including discharge.

From a supervisor's and manager's standpoint, you must administer discipline fairly without partiality to employees. You can't let your emotions or personal likes/dislikes alter this process. This can create impressions of favoritism. If you hold a supervisory position, take care in fraternizing with crew employees outside of work. This can be construed as "playing favorites". Recreational time can lead to inappropriate discussions which in turn will hurt you as a supervisor. A definitive line must be drawn between supervisors and crew members.

Discipline is administered through Employee Interventions and Employee Warnings. How do you determine which to use? Interventions are used primarily in the first offense of a Category II rule or similar policy breach that may not be listed in the Employee Handbook. Think of these as lesser rules/policies but are still important. This is a mechanism to help the employee realize the problem behavior and to make changes. You should contact Human Resources in order to determine if an Intervention has been previously administered while on another project or while under another supervisor. If so, an Employee Warning will be issued. Note that some Category II offenses may warrant an Employee Warning as well as other disciplinary action. An example is "violation of the company's tobacco use standard" – if an employee smokes in the shuttle van he/she is going to be issued an Employee Warning and possibly be suspended for a period of time without pay or discharged.

Category I rules are serious and directly impede TAW's performance, safety, and reputation on the project site, the construction industry, and the community as a whole. Category I violations will result in an Employee Warning with the potential for suspension or discharge for cause.

Disciplinary conferences should be held in a private area. Along with the affected employee, a witness should be present. This is especially important for Category I and serious Category II offenses. The witness should be an employee of TAW such as another superintendent, foreperson or leadperson. The witness will not participate in the conference, but rather serve as a witness for the employee and TAW. The witness should records notes if necessary.

Prior to the conference, investigation should have been completed if necessary in order to substantiate the offense. Confidential discussions should be held with those necessary. Keep record of this and attach to the Employee Intervention or Employee Warning. Complete the Intervention or Warning prior to the onset of the conference. All areas should be completed.

It is suggested that disciplinary conferences be held at the end of the work day. This allows the employee time to think about the information presented without having to immediately return to work. Begin the disciplinary conference by stating the reason for the Employee Intervention or Employee Warning. Maintain eye contact and state the information clearly and concisely. Allow the employee to state information. Show the employee the Intervention or Warning. Review each section. Allow time for the employee to read the information. Note that the employee has the right to respond in writing to the allegations. Allow the employee appropriate time for this. Do not engage in banter. State that the documents will be forwarded to Human Resources for review, and employees have the right to participate in a grievance procedure by contacting the division general superintendent or Human Resources. Using another sheet, document important information and forward with the Intervention or Warning.

Serious offenses that warrant immediate discharge, repeated problematic behavior, repeated behaviors that goes against company policies and rules should be brought to the attention of the division general superintendent, project manager, or Human Resources. Conditions such as a conference with a manager will be scheduled to determine if the employee will return to the assigned project site, another project site, or face discharge. No employee can be discharged without prior approval by Human Resources.

HR will ensure that due process has been afforded the employee. As well if warranted an investigation maybe started. Note that progressive discipline is normally used when Category I rules are not involved.

If in doubt, contact Human Resources.