

GOLD FRAME NIGERIA LIMITED
ENGINEERING & ENVIRONMENTAL SOLUTIONS

SAFETY POLICY

Office Address:

Suite 64, JAB-NAB Plaza

Sapele Street, Off Ladoke Akintola Street

Garki II Abuja-Nigeria

E-mail: goldframeng@gmail.com

Tel: 08055544266, 07065065551

The following safety policy is provided only as a guide to assist employers and employees in complying with the construction requirements, as well as to provide other helpful information. It is not intended to supersede the requirements of the standards. An employer should review the standards for particular requirements which are applicable to their individual situation and make adjustments to this program that are specific to their company. An employer will need to add information relevant to their particular facility in order to develop an effective, comprehensive program.

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Gold Frame Safety Policy

I. OBJECTIVE

The Safety Policy of **gold frame** is designed to comply with the Standards of the Occupational Safety and Health Administration, and to endeavour to maintain a safe and injury/illness free workplace. A copy of the OSHA Safety and Health Standards 1926 and 1910 are available for all employees use and reference; these Standards shall be available at all times. Compliance with the following Safety Policy and all items contained therein is mandatory for all employees of the company. The authorization and responsibility for enforcement has been given primarily to the management, all staff of gold frame share in this responsibility as well.

II. POLICY

It is company policy that accident prevention be a prime concern of all employees. This includes the safety and well being of our employees, subcontractors, and customers, as well as the prevention of wasteful, inefficient operations, and damage to property and equipment.

III. APPLICABILITY

This Safety Policy applies to all employees of **Gold Frame**, regardless of position within the company. The Safety Rules contained herein apply to all subcontractors and anyone who is on a company project site. Every employee is expected to comply with the Safety Policy, as well as OSHA Health and Safety Standards.

IV. IMPLEMENTATION

This Safety Policy supports five fundamental means of maximum employee involvement:

- A. Management commitment to safety.
- B. Weekly tool box safety meetings at all jobsites.
- C. Effective job safety training for all categories of employees.
- D. Job hazard analysis provided to all employees.

E. Audio and / or visual safety presentations given at jobsites by management.

The management will meet at least once a month to evaluate all areas of safety and make recommendations to the company president.

V. ADMINISTRATION

The Safety Policy will be carried out according to guidelines established and published in this and other related procedures. Specific instructions and assistance will be provided by management as requested. Each supervisor will be responsible for meeting all of the requirements of the Safety Policy, and for maintaining an effective accident prevention effort within his or her area of responsibility. Each supervisor must also ensure that all accidents are thoroughly investigated and reported to the management board on the same day of the occurrence.

VI. REPORTING OF INJURIES

All employees will be held accountable for filling out a "Notice of Injury Form" immediately after an injury occurs, even if medical treatment is not required. (Notice must be made at or near the time of the injury and on the same day of the injury.) Employees must report the injury to their supervisor/foreman/superintendent/project manager, etc.

A casual mentioning of the injury will not be sufficient. Employees must let their supervisor know:

A. How they think they hurt themselves.

B. What they were doing at the time.

C. Who they were working with at the time.

D. When and where it happened.

E. Other pertinent information that will aid in the investigation of the incident.

Failure to report an injury immediately (meaning at or near the time of the injury and on the same day of the injury) is a violation of the Safety Policy, and may result in immediate termination, in accordance with company policy.

VII. NOTIFICATIONS

A. In Case of an Injury/ Death

After the injured person has been taken to the hospital, the foreman/supervisor shall notify the main office and management as soon as possible. Statements from witnesses shall be taken. Statements are to be signed by witnesses and should include the time and date. Photographs of the area where the incident occurred and any other relevant items are to be taken, the management board will assist in the investigation. The completed accident report form will be sent to the main office.

B. In Case of Inspection

The foreman/supervisor must notify the management board that an Inspector is on the jobsite. It is the responsibility of all employees to make the inspector's visit on the jobsite as pleasant and timely as possible.

VIII. BASIC SAFETY RULES

- A. Compliance with applicable federal, state, county, city, client, and company safety rules and regulations is a condition of employment.
- B. All injuries, regardless of how minor, must be reported to your supervisor and the Safety Office immediately. An employee who fails to fill out a "*Notice of Injury Form*" and send it to the Safety Office can be issued a safety violation notice and may be subject to termination, in accordance with company policy. In the event of an accident involving personal injury or damage to property, all persons involved in any way will be required to submit to drug testing.
- C. Hard hats will be worn by all employees on the project site at all times. The bill of the hard hat will be worn in front at all times. Alterations or modifications of the hat or liner are prohibited. Crane operators, when in an enclosed cab, have the option of not wearing a hard hat due to the possible obstruction of view.
- D. Safety glasses will be worn as the minimum-required eye protection at all times. Additional eye and face protection such as mono-goggles and face shields are required for such operations as grinding, jack hammering, utilizing compressed air or handling chemicals, acids and caustics. Burning goggles for cutting, burning or brazing and welding hoods for welding, etc., are required.
- E. Fall Protection Requirements:

- Full body harnesses and lanyards shall be worn and secured any time there is a fall hazard of more than six (6) feet.
 - Lifelines shall be erected to provide fall protection where work is required in areas where permanent protection is not in place. Horizontal lifelines shall be a minimum of 2-inch diameter wire rope. Vertical lifelines shall be 3/4 inch manila rope or equivalent and shall be used in conjunction with an approved rope grab.
 - Structural steel erectors are required to "hook up" with full body harness and lanyard.
 - Employees using lanyards to access the work or position themselves on a wall or column etc. must use an additional safety lanyard for fall protection.
 - Man lifts must be used properly. As soon as an employee enters an articulating boom lift and before the lift is started, the employee must put on the harness and attach the lanyard to the lift. Employees are not required to wear harnesses on scissor lifts.
- F. Clothing must provide adequate protection to the body. Shirts must have at least a tee sleeve. Shirts with sleeves and long pants will be worn at all times. No shorts are to be worn on projects. All employees, except welders and burners, must tuck shirt tails inside trousers. Burners and welders will not be permitted to wear polyester or nylon clothing. Sturdy work boots with rigid, slip resistant soles are required. No clogs, tennis shoes or loafers are permitted. Steel-toed tennis shoes with the ANSI label are the only alternative to the leather work boot.
- G. All personnel will be required to attend safety meetings as stipulated by project.
- H. Firearms, alcoholic beverages or illegal drugs are not allowed on company property or in company vehicles at any time. When drugs are prescribed by a physician, the management board must be informed. The use or possession of illegal drugs or alcoholic beverages on the jobsite will result in immediate termination.
- I. Housekeeping shall be an integral part of every job. Supervisors\foremen and employees are responsible for keeping their work areas clean and hazard-free. Clean up is required when a job is finished at the end of the day.
- J. Burning and cutting equipment shall be checked daily before being used. Flash back arresters shall be installed at the regulators on both oxygen and LP bottles. All gas shall be shut off and hoses disconnected from bottles and manifolds at the end of

the work day. Caps shall be replaced on bottles when gauges are removed. When gauges are removed and caps replaced, the oxygen and LP bottles shall be separated into storage areas no less than 20 feet apart with a "No Fire or Smoking" sign posted and a fire extinguisher readily available. Makeshift field repairs will not be allowed.

- K. Drinking water containers are to be used for drinking water and ice only. Tampering with or placing items such as drinks in the water cooler will result in immediate termination. The "common drinking cup" is not allowed. Only disposable cups will be used.
- L. All tools whether company or personal, must be in good working condition. Defective tools will not be used. Examples of defective tools include chisels with mushroomed heads, hammers with loose or split handles, guards missing on saws or grinders, etc.
- M. All extension cords, drop cords, and electrical tools shall be checked, properly grounded with ground fault interrupters (GFI's), and colour-coded by a designated competent person each month. This shall be part of the assured grounding program. Cords and equipment that do not meet requirements shall be immediately tagged and removed from service until repairs have been made.
- N. "Horseplay" on the jobsite is strictly prohibited. Running on the jobsite is allowed only in extreme emergencies.
- O. Glass containers or bottles of any kind are not permitted on jobsites or in company vehicles.
- P. The jobsite speed limit is 10 MPH. No employee is permitted to ride in the bed of a truck standing up or sitting on the outside edges of a truck. Employees must be sitting down inside the truck or truck bed when the vehicle is in motion. Riding as a passenger on equipment is prohibited unless the equipment has the safe capacity for transporting personnel.
- Q. Adequate precautions must be taken to protect employees and equipment from hot work such as welding or burning. Fire extinguishing equipment shall be no further than 50 feet away from all hot work. Used fire extinguishers must be returned to the management board to be recharged immediately. Use of welding blinds is required in high traffic areas.

- R. All scaffolding and work platforms must be built and maintained in accordance with OSHA specifications. All ladders must be in safe condition without broken rungs or split side rails. Damaged ladders shall be removed from service. Ladders shall be secured at the top and bottom and extend three (3) feet past the working surface. Metal ladders around electrical work are prohibited. A step ladder shall never be used as an extension ladder. A step ladder must only be used when fully opened with braces locked.
- S. Crowfoot connections on air hoses shall be wired to prevent accidental disconnection. Compressed air shall not be used to dust off hands, face or clothing.
- T. Report all unsafe conditions and near accidents to management so corrective action can be taken.
- U. All floor openings or excavations shall be barricaded on all sides to ensure employees are aware of the hazards. Floor holes shall be covered, with the covers secured and clearly marked.
- V. Warning signs, barricades, and tags will be used to the fullest extent and shall be obeyed.

IX. ENFORCEMENT OF SAFETY POLICY

Safety violation notice(s) shall be issued to any employee, subcontractor, or any one on the jobsite violating the safety rules and regulations by the management board.

- A. Any violation of safety rules can result in suspension or immediate termination.
- B. Any employee receiving three (3) written general violations within a six (6) month period shall be terminated.
- C. Issuance of a safety violation notice for failure to use fall protection or for failure to report a job injury (at the time of the injury) may result in immediate termination, in accordance with company policy.

It is understood that **Gold Frame** is not restricting itself to the above rules and regulations. Additional rules and regulations as dictated by the job will be issued and posted as needed.

ATTACHMENT A

JOB SAFETY CHECKLIST

The following Job Safety Checklist has been condensed and edited from the Occupational Safety and Health Act, Part 1926, Construction Safety and Health Regulations.

A. SAFETY RULES

- _____ Hard hats and safety glasses worn.
- _____ Shirts with sleeves worn
- _____ Work shoes worn
- _____ Subcontractors' personnel hold safety meetings as indicated by project requirements in accordance with OSHA Safety Standards.
- _____ Work areas safe and clean
- _____ Safety mono-goggles/face shields worn when circumstances warrant
- _____ Electrical cords and equipment properly grounded with GFI's in place and checked by a competent person
- _____ No use of alcoholic beverages or controlled substances
- _____ Subcontractors provide fall protection for their employees in accordance with OSHA Safety Standards
- _____ All scaffolds built to specifications as established by OSHA
- _____ Excavation/trenches sloped or shored as established by OSHA
- _____ Drug testing of employees involved in accident(s) resulting in personal injury or property damage.

B. RECORD KEEPING

- _____ OSHA poster "Safety and Health Protection on the Job" posted
- _____ Hard hat sign posted in a conspicuous manner
- _____ Weekly safety meeting sign-in logs maintained in a folder with a copy forwarded to the main office weekly.

C. HOUSE KEEPING AND SANITATION

- _____ General neatness
- _____ Regular disposal of trash
- _____ Passageways, driveways, and walkways clear

- _____ Adequate lighting
- _____ Oil and grease removed
- _____ Waste containers provided and used
- _____ Adequate supply of drinking water
- _____ Sanitary facilities adequate and clean.
- _____ Adequate ventilation.

D. FIRST AID

- _____ First aid stations with supplies and equipment. The expiration dates of supplies checked monthly. Expired supplies discarded.
- _____ Trained first aid personnel.
- _____ Injuries promptly and properly reported.

E. PERSONAL PROTECTIVE EQUIPMENT

- _____ Hard hats.
- _____ Hearing protection
- _____ Eye and face protection
- _____ Respiratory protection
- _____ Fall protection.

F. FIRE PROTECTION

- _____ Fire extinguishers charged and identified.
- _____ A No Smoking signs posted
- _____ Flammable and combustible material storage area
- _____ Fuel containers labelled.

G. HAND AND POWER TOOLS

- _____ Tools inspected
- _____ Power tools properly guarded
- _____ Safety guards in place.

H. WELDING & CUTTING

- _____ Compressed gas cylinders secured in vertical position.
- _____ Hoses inspected.
- _____ Cylinders, caps, valves, couplings, regulators, and hoses free of oil and grease.
- _____ Caps on cylinders in storage in place.
- _____ Flash back arresters in place.
- _____ Welding screens in place.
- _____ Fuel and oxygen cylinders separated in storage

I. ELECTRICAL

_____ All portable tools and cords properly grounded [Ground Fault Interrupters (GFI=s) properly installed].

_____ Daily visual inspection of caps ends and cords for deformed or missing pins, insulation damage and internal damage.

_____ Tests of cords, tools and equipment for continuity and correct attachment of the equipment grounding connector (GFI) to the proper terminal made every month and:

1. Prior to first use.
2. Prior to return to service after repairs.
3. Prior to return to service after incident that may have caused damage to cord or equipment.

_____ Cords and equipment not meeting requirements immediately tagged and removed from service until repairs have been made.

J. LADDERS

- _____ Inspected at regular intervals.
- _____ No broken or missing rungs or steps
- _____ No broken or split side rail
- _____ Extend at least 36 inches above landing and be secured
- _____ Side rails of 2 x 4 up to 16 feet, or 3 x 6 over 16 feet.

K. SCAFFOLDING

- _____ Inspected at regular intervals.
- _____ Footings are a sound ridge and capable of carrying maximum intended load.
- _____ Tied into building vertically and horizontally at 14 foot intervals.
- _____ Properly cross-braced.
- _____ Proper guardrails and toe boards.
- _____ Scaffold planks capable of supporting at least four (4) times the maximum intended load
- _____ No unstable objects such as concrete blocks, boxes, etc., used as scaffold foundations
- _____ Use of OSHA Scaffold Tagging Program

L. MATERIAL STORAGE AND HANDLING

- _____ Material at least two (2) feet from edge of excavation site
- _____ Proper temperature and moisture levels for safe storage of materials to prevent deterioration or volatile hazards within the storage area
- _____ Inventory maintained and inspected frequently.
- _____ Proper protective gear worn when handling chemicals

M. CONCRETE, CONCRETE FORMS AND SHORING

- _____ Full body harnesses as positioning devices for employees tying rebar greater than six (6) feet above adjacent working surface have
- _____ Automatic shut-off switches on trowel machines

N. MATERIAL HOISTS

- _____ Inspected at regular intervals.
- _____ Operating rules posted at operators station.
- _____ "No Rider" signs prominently posted at all stations.
- _____ All entrances properly protected.
- _____ All entrance bars and gates painted with diagonal contrasting stripes.
- _____ Experienced operators
- _____ Current crane certification inspection sticker and papers on the rig

ATTACHMENT B

SAFETY EQUIPMENT CHECKLIST

The following is a list of Safety Equipment that should be on the job, if required, or available from the *management* at all times. Equipment should be checked at intervals in accordance with the applicable OSHA Safety Standards by the Superintendent to ensure that all required equipment is present and in good condition.

- _____ Safety goggles, shields, and glasses
- _____ Hearing protection
- _____ Respirators
- _____ Hard hats
- _____ Fire extinguishers (properly charged)
- _____ First aid kit (check list inside kit)
- _____ Stretcher or stroke litter (tool room)
- _____ Welding masks and goggles
- _____ Storage racks for compressed gases
- _____ Guards on all power tools
- _____ Trash barrels
- _____ OSHA forms posted
- _____ Company "Safety Policy" packet posted
- _____ Company "Hazardous Communication Program" packet posted
- _____ Emergency vehicle (vehicle designated to carry injured to hospital).

ATTACHMENT D
EMPLOYEE ACKNOWLEDGMENT

I state that I have attended the safety orientation, and have read and received a copy of the **Gold Frame** safety rules and regulations. I further state that I understand these rules and acknowledge that compliance with the safety rules and regulations is a condition of employment. If I violate the safety rules or fail to report an injury to my supervisor immediately, I understand that I am subject to termination, in accordance with company policy.

EMPLOYEE SIGNATURE

DATE

Mgt SIGNATURE

DATE