August 1, 2024

Revisions to Safety Policies

This Document is to communicate revisions made to GCG Construction Inc.'s policies related to our Safety Program and provide information on what has changed and how they impact our team members. These policies were revised due to feedback obtained from GCG Construction employees and efforts to improve employee participation in our Safety Program by providing clear expectations. A description of each policy and the revisions made are listed below as part of this policy. Copies of the policies will be provided to all GCG Construction Superintendents and Project Managers to help communication and understanding of the changes. A copy of our Safety Manual along with posted revisions are available for review in a multitude of ways including: Hard Copy Binder in office, Electronic Version on our server, and Electronic Version our website at http://gcgbuilds.com/plan-room/safety-program

Disciplinary Action for Safety Violation Policy

Policy Purpose: To ensure accountability that GCG Construction employees plan and conduct all activities safely and enforce GCG's Safety Policy in a consistent manner.

GCG Construction, Inc. has applied a progressive discipline plan for safety violations with a "Zero Tolerance" approach towards violations of Fall Protection, Equipment Guarding and Lockout/Tagout was put in place where employees observed in violation of these elements faced immediate termination of employment. This "Disciplinary Action for Safety Violations Policy" replaces all previous versions and has been developed through communication designed to protect our employees and allow opportunity for improvement through training and consistent administration of disciplinary action.

Policy: Violations of Safety Rules will result in disciplinary action, up to and including termination of employment, based on severity except as noted below regarding "Advanced Violations." GCG Construction Company follows a progressive disciplinary action plan for the following offense(s):

First Offense – Written Warning
Second Offense – Three Day Suspension
Third Offense – Termination

NOTE: Progressive discipline follows a rolling six month time frame following the first offense. Violations will be communicated to GCG's Safety Department and logged on a disciplinary action chart. All employees are empowered to report and address safety violations; however written notice of discipline will be issued by Foremen, Superintendents, Project Managers or any other designated GCG Construction employee in a Managerial role. Written notices will be done using the "Employee

Performance Corrective Action Form" and be reviewed with the employee with a copy placed in their personnel file.

Advanced Violation – Violations of Fall Protection, Equipment Guarding or Lockout/Tagout result in Advanced Discipline as described in the "Advanced Discipline Policy Guidelines".

Advanced Discipline for Violations

- First Offense: 5 day suspension with minimum of 6 hours training* related to safety
- Second Offense: Termination

*Training topics will focus on the violation observed and include additional topics on safety. Training will consist of classroom, online and hands on settings and be overseen by the employee(s) supervisor and GCG's Safety Department.
Every violation requires investigation to determine the root cause on why it happened and what corrective actions are needed to prevent future occurrences. GCG Construction reserves the right to determine appropriate disciplinary action based on the severity of the violation and results of the investigation. Use of the progressive disciplinary program is at the discretion of the GCG Construction Inc. and may result in an immediate escalation to a higher step if the violation is deemed high risk and would therefore bypass a lower step.

Responsibility and Authority:

- All workers are expected to comply with the GCG Construction Inc.'s Safety Policy and rules established therein.
- Report all unsafe acts to your Supervisor, the GCG Construction Site Superintendent, Project Team or Safety Department.
- All GCG Construction employees are empowered to stop or prevent unsafe work activities.
- Written notice of violations are to be issued by Superintendents, Project Managers or any other designated GCG Construction employee in a Managerial role.

Advanced Discipline Policy Guidelines:
Fall Protection: While performing construction work, any employee exposed to an elevated fall or fall to a lower level of six feet or more must be protected from falling through the use of fall protection systems. Examples of fall protection systems include, but are not limited to, guardrail systems, personal fall arrest systems, personal fall restraint systems, covers, safety nets, controlled access zones, warning lines, or a combination of these systems. Workers observed working without fall protection while exposed to fall hazards will be in violation of this policy.
Duties associated with inspection, investigation, assessment or installation of fall protection systems require fall protection systems to be in place when employees performing these tasks are exposed to

immediate fall hazards such as a steep sloped roof*, holes or openings, damaged or deteriorated deck/flooring or unprotected sides or edges within six feet.
*Note: A steep sloped roof is defined as having a 4 in 12 (or greater) slope, meaning for every 12 inches of horizontal run, it rises 4 inches (or greater).

Equipment Guarding/Disabling Guards – Equipment guarding/disabling a guard – no employee shall alter, change, or otherwise disable a machine or equipment guard. Employees observed using machines or equipment without the guards in place will be in violation of the policy – regardless if they themselves removed or disabled the guard.

Lockout Tagout – No employee shall remove or disable a lock or tag placed on a piece of equipment, circuit breaker, valve, or any other energy control device. No employee is authorized to work on live or energized systems. Those systems can include electrical, pneumatic, hydraulic, chemical, or mechanical energy. Employees observed to have removed or disable a lock or tag from an energy control device or have performed work on energized systems without a lock or tag – regardless if they themselves removed or disabled the lock – will be in violation of this policy.

Site Specific Safety Plan Policy

Policy Purpose: To ensure that GCG Construction Inc.'s Safety & Health policies and practices are implemented consistently on construction projects requiring site specific plans for projects more likely to have increased safety risks.

Policy: All Projects 1 million dollars or greater in value or involving work identified to be hazardous as determined by the Hazard Identification Checklist shall be required to develop and implement a Site Specific Safety and Health Plan. The plan must include project safety orientations for all site personnel prior to working on the project. Subcontractors are not permitted on site without first reviewing the Site Specific Safety and Health Plan and completing the Project Safety Orientation Program.

Responsibility and Authority

- The Project Manager and Project Superintendent is responsible for coordinating the process and ensuring the Project Team understand this policy and its application.

- The Project Manager (PM) shall not permit Subcontractors to work on the site in violation of this policy.

- The Project Superintendent (PS) shall not permit Subcontractors to work on the site in violation of this policy.

- The PX, PM or PS is authorized to request site specific safety plans for any and all Subcontractors whose work they determine is to be hazardous.

- Risk Management is responsible for performing periodic audits for compliance to this policy. Audit results are to be provided to the Chief Operating Officer.

Input

- Project Specific information relative to logistics, scheduling, and scope of work.

- Site Specific Safety and Health Template.

Output

- Written Site Specific Safety and Health Programs.
- Audit results from Risk Management.

Guidelines

- The PM or PS will develop the plan following the policy and using the Site Specific Safety & Health Plan Template. Completed plans will be submitted to Risk Management for review and approval.

GCG Construction Company – Hazard Identification Checklist
Hazards Triggering a Site Specific Safety Plan

Fall Hazards

- Scaffolding greater than two runs in height
- Iron work involving setting of structural steel
- Roofing work involving removal and replacement of decking and/or on a steep slope
- Framing work involving setting of trusses, joists or braces

Struck by Hazards

- Work involving setting of walls
- Crane work involving material handling over work area
- Work involving heavy equipment or trucks to move materials

Caught in or between Hazards

- Work involving moving parts or machinery
- Trenching work greater than 5 feet in depth

- Demolition work involving equipment or machinery

Electrocution Hazards

- Work taking place within 20 feet of power lines
- Excavating work involving exposure to power lines or cables
- Work involving moving equipment within 20 feet of power lines

Additional Hazards

- Location of building – High traffic area, near rail road, limited range of movement
- Environment – Abatement work (asbestos, lead, mold), weather hazards
- All airborne dust
- Silica Dust-containment and personal protection. Common sources of Silica Cementous materials cured or powder and gypsum materials.
- Elevated noise levels
- Work performed at facility – Client business exposing potential hazards
    - Chemical operations
    - Hospital operations involving lifesaving equipment
    - Correctional or Mental Health institutions