

SUBCONTRACTOR MANAGEMENT



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1. PURPOSE

- a. The purpose of a Subcontractor Management Program is to prequalify and provide guidelines, training, and procedures necessary to protect subcontractor employees on all job locations and ensure that all policies in the H-2 Enterprises LLC (H2E) Safety Manual are followed.
- b. In accordance with H-2 Enterprises' safety program, all work on jobsites must be performed according to the company's Safety Rules. The H2E Safety Manual is available for review online in the ISN system, via company intranet and at the project jobsite.

2. PROCEDURE

- a. Subcontractors will be pre-qualified by reviewing their Safety Programs, Safety Training Documents and Safety Statistics via the ISNetworld platform.
- b. Prior to selection, the following items will be reviewed and approved by H-2 Enterprises, LLC.
 - i. Basic company information
 - ii. Safety Program: Mission, Vision and Goals
 - iii. OSHA 300 log(s)
 - iv. OSHA Citations/Violations
 - v. Experience Modification for the past 3 years
 - vi. Incident Rate(s) including fatalities
 - vii. Training Records
 - viii. Safety Meetings, Topics, Inspections
 - ix. Incident/ Accident Reporting
- c. At the conclusion of each project, subcontractors will have their safety performance reviewed by the H2E Project Supervisor or Foreman, Legal Compliance Manager and the HSE Manager to determine areas of excellence and areas for improvement. The results of this review will be discussed with the subcontractor.

3. APPROVAL PROCESS: SUBCONTRACTOR LIST

- a. The Approved Subcontractors List identifies Subcontractors, Vendors and other Companies/Individuals who, by their previous H2E Subcontractor Safety Orientation Training, safety record and safety process are permitted to perform work/services for H2E.

- b. This list will be updated at least annually, and as necessary, to remain current. It will contain the Company/Individual's name and the date approved. The data is maintained by the Legal Compliance Manager in the ISN system.
- c. Non-compliance by any subcontractor or H2E employee with any part of this described program will result in disciplinary action as outlined in the Company's Corrective Action and Disciplinary Program found in the safety manual.

4. ROLES AND RESPONSIBILITIES

- a. Supervisors (Project Managers, Superintendents, Foremen)
 - i. Supervisors will be trained in Subcontractor Management to identify proper selection and approval of subcontractors.
 - ii. Supervisors will be responsible for all incident reporting and case management for subcontractors onsite.
 - iii. Supervisors will uphold the Safety Manual policies and Safety Rules and ensure all subcontractors follow protocols.
- b. Legal Compliance Manager
 - i. Ensure all subcontractor records are reviewed prior to selection and throughout the duration of the project.
 - ii. Review risk analysis reports to determine if the subcontractor meets all company and regulatory standards.
 - iii. Disqualify any subcontractors from the approved list for violations of policies and/or risk ratings below H2E company standards.
 - iv. Insurance variances will be processed on a case by case basis requiring approval from General Counsel or Chief Legal Officer.
- c. Operations Director
 - i. Director level written approval is required for use of any subcontractor with a grade below a "B" in the grading matrix.
 - ii. Review all records and risk analysis as requested by Legal Compliance Manager.
- d. Safety Manager
 - i. Responsible for review of all subcontractor safety ratings and programs.
 - ii. Assist in issuing and approving variance requests for written safety programs.

5. TRAINING AND DOCUMENTATION

- a. When practical, subcontractors will attend pre-job and kick-off meetings.
- b. Subcontractors will attend H-2 Enterprises Safety Orientation. This will include review and acknowledgment of H2E Safety Rules and Project Owner/General Contractors Safety Orientation.
- c. H-2 Enterprises, LLC requires all subcontract employees to attend a Safety Orientation and Job Safety Analysis (JSA) prior to starting initial work activity.

- d. The Project Supervisor or Foreman coordinates all safety orientations. All subcontract employees attending the orientation must have available for immediate use all required Personal Protective Equipment (PPE) prior to starting their work activity.
- e. Re-Orientation: Subcontract employees are required to attend a re-orientation class at least once each year, after their initial orientation.
- f. The H2E Project Supervisor or Foreman will maintain contract employee safety orientation files on-site and provide to Legal/Compliance and Safety departments. The Subcontractor Safety Orientation Sign-in Sheet will be maintained by the Project Supervisor or Foreman.