



SAFETY & HEALTH POLICY

Safety is our Value



From the President:

Bell Tower Corporation considers no phase of its operation more important than safety and health protection. We will provide and maintain safe and healthful working conditions and establish and insist upon safe work methods and practices at all times.

Safety and health shall be an integral part of all operations, including planning, procurement, development, production, administration, sales and transportation. Accidents have no place in our organization.

We will work consistently to maintain safe and healthful working conditions: to adhere to proper operating practices and procedures designed to prevent injuries and illnesses; and, to comply with federal, state and local consensus standards and company safety and health regulations.

Each level of management must reflect an interest in company safety and health objectives and is required to set a good example by always observing the rules as part of the normal work routine. Management interest must be vocal, visible, and continuous, from top management to departmental supervisors.

All employees shall follow safe working practices, obey rules and regulations and work in a way that maintains the high safety and health standards developed and sanctioned by Bell Tower Corporation.

We urge all employees to make safety and health programs an integral part of your daily operations. Then, the total elimination of accidents and injuries will become not just an objective but a way of life.

Richard Bell
Bell Tower Corporation

INTRODUCTION

This organization has always believed that its employees are the most important asset. We will always place a high priority on safe operations and on the safety and health of all employees

PURPOSE OF THE SAFETY & HEALTH PROGRAM

This policy is meant to:

- 1. Clarify safety and health policies*
- 2. Create consistency and continuity*
- 3. Serve as a checkpoint whenever safety and health appear to conflict with production*
- 4. Support supervisors in their enforcement of safety and health rules and safe work practices.*

This policy is the cornerstone of your safety and health is a requirement for both management and employees. We will involve management and employees in planning, developing and implementing safety health protection.

GOALS AND OBJECTIVES:

To maintain zero hazards at all times. To reach this goal, conduct weekly inspections with emphasis on good housekeeping, proper use of protective equipment, condition of critical parts of equipment and preventative maintenance.

SAFETY POLICY STATEMENT

To all employees of Bell Tower Corporation: We are continually updating and modifying our safety and health program to make our company a safer place to work. Changes in the program will need to be fully understood and enforced in order for this to happen

Effective as of Jan 1st, 2006 new rules, regulations, and guidelines will be strictly enforced to protect each of you and provide for the welfare of others.

Immediately upon receipt of this information, each employee will review the new safety material. Each will sign and return the acknowledgement statement of all new rules, which will be enforced by Bell Tower Corporation.

When a reportable accident occurs whether time or no time is lost, the entire crew is to take 15 minutes that day and discuss the reportable accident and how it could have been prevented.

In both cases, these discussions are to be written down and signed by each member of the crew and faxed immediately to the safety coordinator office and Richard Bell.

ASSIGNMENT OF RESPONSIBILITY

EMPLOYEES

It is the duty of each and every employee to know the safety rules, and conduct their work in compliance with these rules. Disregard of the safety and health rules shall be grounds for disciplinary action up to and including termination. It is also the duty of each employee to make full use of the safeguards provided for their protection. Every employee will receive an orientation when hired and receive a copy of the Company Safety and Health Program.

Employee responsibilities include the following:

- Reading, understanding and following safety and health rules and procedures.
- Signing the *EMPLOYEE ACKNOWLEDGEMENT STATEMENT*
- Wearing personal protective equipment at all times when working in areas where there is a possible danger of injury.
- Wearing suitable work clothes as determined by the supervisor/foreman.
- Performing all tasks safely as directed by their supervisor/foreman.
- Reporting ALL injuries, no matter how slight to their supervisor/foreman immediately, and seeking treatment promptly.
- Knowing the location of first aid, fire fighting equipment, and other safety devices.
- Attending any and all required safety and health meetings.
- Not performing potentially hazardous tasks, or using any hazardous material until properly trained, and following all safety procedures when performing those tasks.
- STOPPING AND ASKING QUESTIONS IF EVER IN DOUBT ABOUT THE SAFETY OF ANY OPERATION.

SUPERVISOR/FOREMAN

The Supervisors and/or Foreman will establish an operating atmosphere that insures that safety and health is managed in the same manner and with the same emphasis as production, cost and quality control.

- Regularly emphasizing that accident and health hazard exposure preventions are not only moral responsibilities, but also a condition of employment.
- Identifying operational oversights that could contribute to accidents which often result in injuries and property damage.
- Participating in safety and health related activities, including routinely attending safety meetings, reviews of the facility, and correcting employee behavior that can result in accidents and injuries.

- Spending time with each person hired explaining the safety policies and the hazards of their particular work.
- Ensuring that initial orientation of “new hires” is carried out by the Safety Coordinator.
- Making sure that if a “Competent Person” is required, that one is present to oversee, and instruct employees when necessary.
- Never short-cutting safety for expediency, or allowing workers to do so.
- Enforcing safety rules consistently, and following company’s discipline and enforcement procedures.
- Conducting a daily, job-site safety inspection and correcting noted safety violations.

SAFETY COORDINATOR

Bell Tower has a designated Safety Coordinator. The phone numbers are:

OFFICE: 918-789-9020

Cell: 918-640-7135

It shall be the duty of the Safety Coordinator to assist the Supervisor/Foreman and all other levels of Management in the initiation, education, and execution of an effective safety program including the following:

- Introducing the safety program to new employees
- Following up on recommendations, suggestions, etc., made at the Weekly safety meetings. All topics of safety concerns must be documented accordingly
- Assisting the personnel in the execution of standard policies
- Conducting safety inspections on a periodic basis
- Addressing all hazards or potential hazards as needed
- Preparing monthly accident reports and investigations
- Maintaining adequate stock of first aid supplies and other safety equipment to insure their immediate availability
- Making sure there is adequate number of qualified first aid certified people on the work site
- Becoming thoroughly familiar with OSHA regulations and local and state safety codes
- Defining the responsibilities for safety and health of all subordinates and holding each person accountable for their results through the formal appraisal system and where necessary, discipline procedures.
- Emphasizing to employees that accidents create unnecessary personal and financial losses

EMPLOYEE ACKNOWLEDGEMENT STATEMENT

I have read and I understand the company SAFETY POLICY STATEMENT.

I have the company SAFETY & HEALTH POLICY, and I know the safety rules.

I have studied the entire manual, and I know the responsibility the I have with respect to the safety program.

I agree with company's SAFETY & HEALTH POLICY and I agree to follow them.

I understand that following the company's safety policy and rules is mandatory and is a condition of my employment.

Signed:

Employee Name

Date

Index

- A. General Duties
- B. Occupational Health and Environment Controls
- C. Personal Protective and Life Saving Equipment
- D. Fire Protection and Prevention
- F. Tools-Hand and Power
- G. Welding and Cutting
- H. Electrical
- I. Cranes, Winches and Hoists
- J. Rigging Equipment for Material Handling
- K. Excavation
- L. Fall Protection
- M. Vehicles
- N. Physical examination and drug testing
- O. Control of Hazardous Energy (Lockout/Tagout)
- P. Scaffolding
- Q. Tools, Equipment and Machinery

Additional Programs or Policies

RF ENERGY EXPOSURE POLICY
HAZARD COMMUNICATION MSDS PROGRAM
HAZARD IDENTIFICATION
SAFETY MEETINGS AND TRAINING PROGRAM
RECORD KEEPING
EMERGENCY RESPONSE PLAN
ACCIDENT INVESTIGATION
SAFETY AUDITS

A. General Duties

1. Duties of Employees:

An employee:

- a. Shall not work in conditions that are unsanitary, hazardous, or dangerous to their health or safety.
- b. Shall use such safety materials, equipment, devices and clothing as are intended for your protection and furnished to you by the company.
- c. Follow all prescribed procedures with respect to safety and health.
- d. Take all reasonable and necessary precautions to ensure your safety, the safety of your fellow workers, and any person likely to be affected by your acts.
- e. Comply with all instructions from your supervisor concerning safety and health.
- f. Report to your supervisor anything or circumstance in a work place that is likely to be hazardous to you, your fellow workers or other persons granted access to the work place.
- g. Shall not attempt aerial work if you are not completely physically fit and sound mind.
- h. Absolutely no liquor or prohibited substance is allowed on company property or project premises. Workers intoxicated or under the influence of an illegal substance are not permitted on the project grounds.
- i. Never take part in any "horseplay" or perform any unsafe act that will place you or anyone else in a dangerous position.
- j. Never smoke in areas where "No SMOKING" signs are posted and obey all signs and posted notices.
- k. Company policy may prohibit a worker from climbing under adverse weather conditions unless an emergency exists. For example, rain, snow, ice, and wind can make climbing steel poles and towers difficult and dangerous.

If you feel that you are in a dangerous situation where serious harm could happen to you or a fellow employee, you should refuse the assignment and notify your supervisor. If this does not resolve the issue, you should call the following people in this order, giving each a chance to resolve the issue: Your immediate supervisor, the company safety officer, the company owner and then OSHA.

B. Occupational Health and Environment Controls

1. First Aid

- a. Approved first aid kits and supplies shall be on all work sites.
- b. In the absence of an easily accessible infirmary, clinic, hospital, or physician, a person with First Aid training, including instruction in artificial respiration must be on site at all times.
- c. There must be transportation for an injured person on site at all times or a readily available telephone for contacting an ambulance.
- d. Emergency numbers should be posted in an easily accessible and conspicuous location such as on the lid of all first aid kits or by the phone.

2. Sanitation

- a. An adequate supply of drinking water shall be on site at all times.
- b. The water container shall be clearly marked and not used for anything else.
- c. Water container must be capable of being tightly closed and equipped with a tap.
- d. Use of a common cup is prohibited.
- e. Under temporary field conditions not less than one toilet facility will be made available or transportation readily available to nearby toilet facilities.
- f. There shall be adequate washing facilities for washing off contaminants, readily available on the site. The requirements of this subdivision do not apply to mobile crews or to normally unattended work locations if employees working at these locations have transportation readily available to nearby washing facilities, which meet the other requirements of this paragraph.

3. Non-ionizing Radiation

- a. The American National Standards Institute has determined that it may be harmful for the human body to be exposed to RF frequencies between the range of 3 kHz to 300 Ghz. Therefore people are not allowed to be exposed to RF Frequencies of 125 mW/cm² or @greater for longer than 5 minutes.

4. Hazard Communication

- a. A written program shall be available on each site and corporate facilities.
- b. A list of all hazardous material data sheets that are used will be in at corporate facilities.
- c. There will be a data sheet "on site" for any material that is being used on site.
- d. Employees shall be trained to recognize hazardous material and also how to handle each hazard.
- e. Employers and employees shall ensure that labels on containers are not removed or defaced. It is very important that of copy of these labels are on file and read by all personnel involved.
- f. Any material that is flammable must be handled and stored in the proper manner.
- g. Prior to start of every project a pre-job hazard assessment will be performed. This survey is designed to identify any and all hazards that may exist on the job site and to identify and list all emergency phone #'s and local hospitals.

C. Personal Protective and Life Saving Equipment

1. Head Protection

- a. Employees working in areas where there is a possible danger of head injury from impact, or from falling or flying objects, or from electrical shock and burns, shall be protected by a hard hat as specified by ANSI standard 289.1-1969.
- b. Hard hats shall be worn at all times on a job site.
- c. Hard hats shall be worn at all times while working in an office yard where an overhead hazard exists.
- d. While working above ground a cinch strap should be worn with the hard hat.

2. Hearing Protection

- a. Whenever the noise levels exceed the recommended levels ear protective devices will be provided and used.
- b. Plain cotton is not an acceptable protective device.

3. Eye and Face protection

- a. In any situation where there is a danger of flying objects, eye and face protection will be used.
- b. Eye and face protection will conform to ANSI Z87.1-1968
- c. If corrective lenses are being used, then goggles that fit over the lenses, or goggles that incorporate the corrective lenses will be used.
- d. Face and eye protection equipment shall be kept clean and in good repair.
- e. Sunglasses that are not approved safety devices are not to be used on the work site.

4. Respiratory Protection

- a. Should be used any time there is an exposure to hazardous material.
- b. Respirators should be fitted for each individual.
- c. Respirators are designed for different types of hazardous material, be sure the correct one is being used.
- d. Respirators shall be inspected regularly and maintained 'in good condition.

5. Foot Protection

- a. The proper work boots that are designed for compression, impact and electrical as specified in ANSI Z41 shall be worn all times while on the job site.
- b. Safety-toe work boots need to be worn only in situations where they apply.

D. Fire Protection and Prevention

1. Fire Protection

- a. When working in an area where there is a possible fire hazard, there will be a written protection program in place.
- b. No less than one A2 fire extinguisher shall be on site at all times.

2. Flammable and Combustible Liquids

- a. Only the original container or approved metal safety cans shall be used for storage.

- b. No more than 25 gallons of flammable liquids can be stored outside of an approved storage cabinet.
 - c. Approved storage cabinets must be labeled and can store no more than 60 gallons of flammable and 120 gallons of combustible liquids. Larger quantities must be stored in an inside controlled atmosphere.
3. Temporary Heating Devices
- a. Heaters used in the vicinity of combustible tarp material, canvas, or similar coverings shall be located at least 10 feet from the coverings. The coverings shall be securely fastened.

E. Signs, Signals, and Barricades

1. Accident Prevention Signs and Tags
- a. Signs and signals should be used to alert people to: danger, caution, exit, direction, traffic, hardhat areas and accident prevention.
2. Signaling
- a. Signals are to guide people in the proper
3. Barricades
- a. Barricades are used to keep people out.

F. Tools-Hand and Power

1. Hand Tools
- a. All tools shall be maintained in good working condition.
 - b. All guards on tools should be left in place as the tool was originally designed.
 - c. All hand-held power tools will have a positive "on-off" control switch which can have a lock that can be released by a single motion.
 - d. All power tools shall be sounded by double insulation or proper grounding.

- e. Pneumatic tools and hoses shall be connected by a positive means and safety clips used to prevent accidental disconnection.
- f. All performance tags and labels shall be visible at all times.

2. Abrasive Wheels

- a. All machines shall have their manufactured guards in conformance with ANSI B7 1-1970. If in doubt check with product informational guide sold with the tool.
- b. Eye protection should be used at all times while grinding.
- c. All abrasive wheels should be checked frequently for cracks and defects.
- d. Every machine that has exposed moving, rotating, electrically charged or hot parts that constitutes a hazard to an employee shall be equipped with a machine guard.
- e. Where a machine guard is installed on a machine, no person shall use or operate the machine unless the machine guard is in its proper position.

G. Welding and Cutting

1. Cutting

- a. When transporting cylinders they shall have their caps on and in the upright position.
- b. Cylinders shall be properly supported so that they cannot fall over.
- c. Cylinders will be far enough from the work area so that no sparks, slag or flames will reach them.
- d. Valves should be shut off when not in use.
- e. All equipment should be checked before each use to be sure it is 'in like new condition.
- f. The proper eye guards and clothing should be used at all times.

2. Welding

- a. All equipment will be in like new condition and inspected before each use.

- b. The machine will be properly grounded.
 - c. The proper eye protection and clothing will be worn while working.
 - d. Be sure there is proper ventilation when welding,
 - e. Persons *not* wearing proper eye protection should not look directly at the welding process.
3. Cad weld
- a. Employees must read and understand all instructions before using the mold.
 - b. Insure the proper equipment is used for each specific task.
 - c. Wear all the proper protective clothing, gloves and face protection.

H. Electrical

1. General Requirements
- a. Proper equipment should conform to a particular task.
 - b. All tools will have the manufacturer's labels and instructions visible at all times.
 - c. Splices in cords are allowed only if the splice is insulated to the equivalent of its original condition.
 - d. A temporary junction box must have a ground fault interrupter or a ground fault protection in line to protect the employee.
 - e. All extension cords shall be of the three wire, three pronged plug type and designed for hard use, type S, and in good condition.
 - g. Only extension cords with number 12 wire or larger may be spliced.

I. Cranes, Winches and Hoists

1. General Requirements

- a. Rated load capacities, and recommended operating speeds, special hazard warnings, or instructions shall be visibly posted on all equipment.
 - b. All posted material shall be visible to the operator while at the control station.
 - c. A competent person shall inspect the equipment before and during each days work, any necessary repairs should be done before any work is accomplished.
 - d. Daily inspection should be noted on the daily work report.
 - e. A thorough annual inspection will be done on equipment by a competent person and this inspection documented and put in the equipment's file.
 - f. No modifications or additions that may affect the capacity or safe operations of the equipment shall be made without the manufacturers' written approval. If approved modifications change the rating, then the rating tags must also be changed.
9. The rotating superstructure and outriggers of the crane should be barricaded or marked with visible ribbon.
- h. A fire extinguisher of a 5BC rating must be carried at the operator's station.
 - i. The use of a crane with a personnel basket is prohibited except when the erection, use, and dismantling of conventional means of reaching the work site, such as personnel hoist, ladder, stairway, aerial lift, elevating work platform or scaffold would be more hazardous, or is not possible because of structural design or work site conditions. An engineer must design the bucket.
 - j. A positive acting device shall be used on all cranes to automatically stop the block before it hits the boom.
 - k. Personnel should never be lifted by a crane or hoist unless an engineer first designs the lift.
 - l. For cranes and hoists all exposed moving parts such as gears, projecting screws, set screws, chain, cables, chain sprockets, and reciprocating or rotating parts, which constitute a hazard, shall be guarded.
 - m. No worker shall operate a crane or hoist unless they have written proof of training indicating that he is trained 'in the safe operation of the crane or hoist.

- n. Safety precautions must be taken when operating a Winch, crane or hoist for overhead power lines. Remember to take in consideration a moving boom or tag line, a telescoping boom, winch lines close to power lines, or the load striking the power lines.
- o. No operator shall leave unattended the controls of a crane or hoist with a load raised.
- p. Cranes with telescoping booms shall be equipped with clear marks to indicate the extension length.
- q. A framed steel structure or personnel platform shall be designed by an engineer.
- r. All operators shall be familiar with the international hand signals; if they cannot see the load or signalman then they should be using radios for directions.

J. Rigging Equipment for Material Handling

1. General Requirements

- a. No cable shall contain six randomly distributed wires that are broken in one rope lay or three or more wires that are broken in one strand in a rope lay.
- b. No cable shall have wear of one-third the original diameter of outside individual wires.
- c. No cable shall be smaller than its specified nominal rope diameter.
- d. No cable shall show evidence of kinking, crushing, bird caging, or any other damage resulting in distortion of the rope structure.
- e. Independent lines more than two broken wires in one lay in sections beyond end connections or more than one broken wire at the end connection.
- f. Rotation-resistant wire rope shall not be used where an inner wire or strand for a cable is damaged or broken.
- g. Rigging equipment and cable shall be inspected prior to the start of each work day and as necessary during its use to be sure it is safe. This inspection will be recorded on the daily work report and later filed.
- h. Rigging equipment shall not be loaded in excess of its recommended safe workings, load. A safety factor of five is recommended for rigging and a safety factor of ten for personnel lifting.

- i The preferred method for putting in an eye is a loop socket with six inches of the loop tall and clipped so that the connection can not come loose.
- j Alloy steel chains, hooks, and shackles alone, with rope and cable blocks shall be stamped as to their load rating. Rope and/or cable blocks shall be sized for the intended load.
- k All hooks will have safety ties, also hooks will be inspected prior to each use to be sure that they have not spread.
- l All hook safety latches shall be inspected and replaced when they no longer perform their task.
- m A sling or similar device made of web-type fabric or nylon shall be labeled to indicate its load rating capacity.
- n No sling or similar device for rigging or hoisting made of web-type fabric or nylon shall be used in a manner where the sling, may be cut.
- o An overhaul weight used on a cable shall be prevented from sliding up and down and shall be securely attached to the load hook and the cable.
- p A tag line should be used on any load that is being lifted off of the ground.
- q Splices in synthetic ropes shall be done in accordance with the rope manufacturer.
- r Synthetic ropes used for lifting or tagging shall be used in accordance to the rope manufacturers load ratings.

K. Excavation

1. General Requirements

- a All surface encumbrances that are located so as to create a hazard to employees shall be removed or supported, as necessary, to safeguard employees.
- b A stairway, ladder, ramp or other safe means of exit shall be located in trench excavations that are 4 feet or more in depth so as to require no more than 25 feet of lateral travel for employees.
- c No employee shall be permitted underneath loads handled by lifting and digging equipment while in a trench.
- d Where possible hazardous atmosphere exists where less than 19.5 percent oxygen could occur, the atmosphere in the excavation shall be tested before employees enter excavations greater than 4 feet in depth.

- e. Employees shall not work in excavations in which water is accumulating, unless adequate precautions have been taken to protect employees against the hazards posed by water accumulation.
- f. Keep all material that could pose a hazard by falling or rolling into excavations, 2 feet away from the edge of the excavation.
- g. There are several methods of making an excavation below 4 feet safe, all should be designed and approved. OSHA requirements should be followed.

L. Fall Protection

1. Fall Protection Systems

- a. You shall use a personal fall protection system if you are a distance of more than 6 feet above the ground. This means that you shall be attached to the structure in some manner at all times.
- b. A personal fall protection system is defined as a personal fall arrest system, a body positioning system, or ladder safety climb system. The system will protect you from falling, or safely arrest your fall, should a fall occur.

2. Fall-Arrest System

- a. A personal fall arrest system means a system used to arrest the fall of an employee from a work location.
- b. A fall-arrest system that is used to arrest the fall of a person shall prevent that person from being subjected to a peak fall arrest force greater than 1,800 lbs or falling freely for no more than six feet. A shock absorber lanyard must be used.
- c. The components of a fall arrest system typically consist of: anchorage point, life line, rope grab, lanyard with a shock absorber and full body harness. There shall be at least one safe and accessible ladder for each gang working in a single hatch. An effective means of gaining a handhold shall be provided at or near the head of each vertical fixed ladder. No more than two ladders are required in any hatch regardless of the number of gangs present.

3. Ladders

- a. When any fixed ladder is visibly unsafe (or known to be unsafe), a supervisor shall identify such ladder and prohibit its use by employees.
- b. Where portable straight ladders are used, they shall be of sufficient length to extend three feet (.91 m) above the upper landing surface, and be positively secured or held against shifting or slipping.

- c. When conditions are such that a straight ladder cannot be used, Jacob's ladders meeting the requirements of OSHA 1918.23 may be used.
- d. Where access to or from a stowed deckload or other cargo is needed and no other safe means is available, ladders or steps of adequate strength shall be furnished and positively secured or held against shifting or slipping while in use. Steps formed by the cargo itself are acceptable when the employer demonstrates that the nature of the cargo and the type of stowage provides equivalent safe access.
- e. Where portable straight ladders are used they shall be of sufficient length to extend at least three feet (.91 m) above the upper landing surface.
- f. The following standards for existing manufactured portable ladders must be met: Rungs of manufactured portable ladders obtained before January 21, 1998 shall be capable of supporting a 200-pound (890 N) load without deformation. Rungs shall be evenly spaced from nine to sixteen and one-half inches (22.9 to 41.9 cm), center to center. Rungs shall be continuous members between rails. Each rung of a double-rung ladder (two side rails and a center rail) shall extend the full width of the ladder. Width between side rails at the base of the ladder shall be at least 12 inches (30.48 cm) for ladders 10 feet (3.05 m) or less in overall length, and shall increase at least one-fourth inch (0.64 cm) for each additional two feet (0.61 m) of ladder length.

4. Anchorage Point

- a. The anchorage point shall be a secure point of attachment for lifelines or lanyards and is independent of the means of supporting or suspending the employee.
- b. The anchorage point of a fall-arrest system shall be capable of withstanding a force of 5000 lbs. and be free of sharp edges that might cut or chafe the connection between the lifeline and the fixed support.

5. Lifeline

- a. A lifeline means a component consisting of a flexible line for connection to an anchorage point at one end, and serves as a means for connecting a rope grab.
- b. A life line shall: extend to the ground or be provided with a positive stop that presents the connection from the rope grab from running off the end of the life line, be free of knots, splices and imperfections, be used in such a way that is not likely to be cut or chafed, be consistently used by only one person at a time. A lifeline shall not be used for any other purpose other than fall prevention.

6. Rope Grab

- a. A rope grab is a device that travels freely on a lifeline but when a load force is applied to the mechanism it will lock on the lifeline and prevent further movement downward.
- b. Only those rope grabs that have been approved by the company and in turn are matched properly with the size and type of rope in order for the device to effectively arrest a fall shall be used.

7. Lanyard with Shock Absorber

- a. A shock absorber (deceleration device) is a mechanism that serves to dissipate a imposed on an object during a fall arrest.
- b. A lanyard means a flexible line of rope or strap that generally has a locking type snap hook at each end for connecting the full body harness to a rope grab.
- c. A shock absorber shall always be used with your lanyard in a fall arrest system.
- d. A lanyard in fall prevention terms is the means to connect your safety harness to the fall prevention equipment or tower. A shock-absorbing lanyard should be used for this.
- e. An adjustable lanyard may be used as a positioning device but cannot double as a fall prevention device.

8. Body Harness

- a. A full body harness is a design of straps which when secured about you, will distribute the fall arrest forces over your thighs, pelvis, waist, chest and shoulders.
- b. The harness will have a D ring in the back where the lanyard will attach.
- c. The harness and body from the vertical centerline should not exceed 30 degrees.
- d. The harness should have a D ring in the front for using a safety climb system.

9. Inspection

- a. Items subject to fall arrest or impact forces must be immediately removed from service and destroyed.
- b. Any item showing excessive wear or deterioration should be destroyed.
- c. Any item not purchased from an approved manufacturer or certified by the company should not be used.

- d. Personal fall arrest system and their components shall be used only for employee fall protection.
- e. It is the responsibility of each employee to inspect his or her own safety equipment. It is the responsibility of the foreman to inspect the safety equipment of each individual and also his own. It is then that foreman's responsibility to log that inspection in the daily work report each day.

10. Body Positioning System (Pole Strap)

- a. A body positioning system means a system of equipment or hardware which when used with a linemen's body belt shall allow you to be supported at an elevated work location and work with both hands free.
- b. A positioning device while not classified as a safety belt needs to have wear indicators and be a specified strength so that it does not cause a fall.
- c. A hook with the proper safeties and strength can also be used as a positioning device.
- d. A positioning device should never be used as a lanyard.

11. Lineman's Body Belt

- a. A linemen's body belt means a belt which consists of a belt strap with at least 2 D rings, 4 loops and a cushion of 3 1/2" for back support.
- b. If a system is used that does not have a 3 1/2" cushion, then the forces must be transferred from the back to the thighs by the use of straps.

12. Ladder Safety climb System

- a. A ladder safety climb system shall allow you to ascend or descend without continually having to hold, push or pull any part of the system, having both hands free for climbing.
- b. The connection between the carrier or lifeline and the point of attachment to the body harness shall not exceed 9 inches.
- c. A ladder safety climb system is not designed to replace a positioning device, do not use a safety climb as a workstation.

M. Vehicles

1. General Requirements

- a. Maintain the vehicle in the employee's care, regularly inspecting the vehicle for faulty brakes, lights, signal and hazard lights, windshield wipers, damaged

windshields, faulty steering, tire condition, mirrors and any other potential problems which would make the vehicle unsafe to drive.

- b. Abide by all regulations, speed laws, load limits, etc. while operating the vehicle in any city or state.
- c. Do not drive a company vehicle after consuming or under the influence of any alcoholic beverage or controlled substance.
- d. No employee shall drive a company vehicle if they do not have a valid drivers license, or are not authorized by the company to drive.
- e. All vehicles will be repaired by qualified personnel when necessary.
- f. All vehicles are to be equipped with a fire extinguisher and a stocked first aid kit.
- g. Use of a company vehicle after working hours will be limited to the following:
 - 1. Driving to a restaurant for meals
 - 2. Driving to a Laundromat
 - 3. Driving to medical facilities.
- h. Employees in a supervisory position will enforce the above rules and fully inform employees under his or her control.
- i. Should a supervisor allow a crewmember to use a company vehicle after work hours, he will confine the use of the vehicle to within the above guidelines.

2. Commercial Drivers License

- a. Employees must have a CDL to operate the following commercial motor vehicles:
 - 1. A single vehicle with a gross vehicle weight rating of more than 26,000 pounds.
 - 2. A trailer with a gross vehicle weight of more than 10,000 pounds if the gross combination weight rating is more than 26,000 pounds.
 - 3. A vehicle designed to transport more than 15 persons (including the driver).
 - 4. Any size vehicle that requires hazardous materials placards.

N. Physical examination and drug testing

- a. As a condition of employment each new employee shall have a physical examination.
- b. As a condition of employment each new employee shall be drug, tested.

- c. As a condition of employment all employees will be subject to a random drug testing program.

O. Control of Hazardous Energy (Lockout & Tagout) -

Since the inception of its program, Bell Tower Corporation has intended to ensure that employers safeguarded their maintenance and service employees through the use of lockout/tagout from the hazards involving the unintentional release of hazardous energy. The rule addresses practices and procedures that are necessary to disable machinery or equipment and to prevent the release of potentially hazardous energy while maintenance and servicing activities are being performed.

Each employee shall be allowed to determine whether servicing and maintenance operations require lockout.

1. Each employee shall
 - (a) Recognize hazardous energy;
 - (b) Type and magnitude of energy found;
 - (c) The means and methods of isolating and/or controlling energy; and
 - (d) The means of verification of effective energy control.
2. Supervisors shall verify that affected employees have been instructed in the purpose and use of the energy control procedures, Verify that all other employees who may be affected by the energy control procedures are instructed about the procedure and the prohibition relating to attempts to restart or reenergize such machines or equipment infraction.

P. Scaffolding

A scaffold is defined as an elevated, temporary work platform. There are three basic types of scaffolds:

- a. Supported scaffolds, which consist of one or more platforms supported by rigid, load-bearing members, such as poles, legs, frames, outriggers, etc.
- b. Suspended scaffolds, which are one or more platforms suspended by ropes or other non-rigid, overhead support.
- c. Other scaffolds, principally manlifts, personnel hoists, etc., which are sometimes thought of as vehicles or machinery, but can be regarded as another type of supported scaffold.

Common Hazards Associated with All Scaffolds

- a. Falls from elevation, due to lack of fall protection;
- b. Collapse of the scaffold, caused by instability or overloading;
- c. Being struck by falling tools, work materials, or debris; and
- d. Electrocution, principally due to proximity of the scaffold to overhead power lines.

As a minimum the following will be accomplished before the use of scaffolding:

- a. Insure the use of a competent person (as defined in 29 CFR 1926.32) to inspect scaffolds and equipment before use.
- b. Use of scaffold components capable of supporting proper loads.
- c. Proper shielding of ropes from corrosive processes or heat.
- d. Use of both guardrail systems and body belt or harness systems for work from suspension scaffolds.
- e. Comply with the current and proposed OSHA regulations for working with scaffolds.
- f. Assure that design and construction of scaffolds conform with OSHA requirements.
- g. Provide personal fall protection equipment and make sure that it is used by all workers on suspension scaffolds.
- h. Use structurally sound portions of buildings or other structures to anchor droplines for body belt or harness systems and tiebacks for suspension scaffold support devices. Droplines and tiebacks should be secured to separate anchor points on structural members.
- i. Provide proper training for all workers who use any type of suspension scaffold or fall protection equipment.
- j. Follow scaffold manufacturers' guidance regarding the assembly, rigging, and use of scaffolds.

Q. Tools, Equipment and Machinery

1. Jobsite Equipment

- a. All equipment shall be in good operating condition.
- b. All equipment, such as backhoes, forklifts etc. are to have a backup alarm system.
- c. All equipment shall have rollover protection bars.
- d. All equipment will have seat belts, which are to be used.
- e. The user should be trained in the use of the tool or piece of equipment.
- f. The equipment should be inspected.
- g. Tools should be inspected for operational integrity.
- h. Tools and equipment should be used only for their intended purpose.
- i. Tool abuse or misuse will not be tolerated.
- j. Equipment will be kept in a clean and operational condition.
- k. Any tool, machinery or equipment not passing inspection should be reported to the supervisor immediately.
- l. Operating manuals, as provided by the OEM, shall be present during the use of power tools, equipment or machinery.
- m. Personal protective equipment must be worn when using power equipment.
- n. Moving machine parts have the potential for causing severe workplace injuries, such as crushed fingers or hands, amputations, burns, blindness, just to name a few. Safeguards are essential for protecting workers from these needless and preventable injuries. Any machine part, function, or process which may cause injury must be safeguarded. When the operation of a machine or accidental contact with it can injure the operator or others in the vicinity, the hazards must be either eliminated or controlled.

HAZARD IDENTIFICATION POLICY

Each job foreman shall review work conditions at the beginning of each job, to anticipate exposures that might increase the likelihood of injury to employees.

Not less than quarterly, the safety supervisor shall conduct a Hazard Identification Review, utilizing the 'Pre-job Survey Forms'. The Hazard identification Reviews shall be coordinated by the safety supervisor and forwarded to the president of the company. The forms, once reviewed, shall be filed and kept for 3 years. Any review that notes new conditions (physical and mental) as accident exposures shall cause a review of the company's training program.

Hazards to be looked for during the Pre-job Survey shall include the following, as well as those determined appropriate by the safety supervisor/committee:

1. Physical Exposures associated with the job site and work conditions, operation of machinery, movement and storage of material and machinery, also included outside sales & service exposures.
2. Chemical Exposures associated with painting, maintenance, housekeeping, and employee exposures at customer sites.
3. Employee Work Practices associated with routine operations and in response to emergencies related to the company operations or outside influences.
4. Changes in Company Policies that affect the workers. This could be related to weather, extended work schedules, overtime, travel, etc.
5. Changes in Customer Practices that alter employee's existing routine, performance, time restraints etc.

Once the Hazard Identification Review has detected a potential hazard, the safety coordinator will assign (document in writing) people with the appropriate qualifications to develop measures (training, operational changes, ordering of appropriate equipment, change in manpower requirements, use of personnel protective equipment, etc.) to prevent accidents because of the new exposures.

The persons who are assigned this task will acknowledge this responsibility in writing by noting in simple terms what they plan to do and the time required. The safety coordinator shall log the letter and follow-up on the progress.



PRE-JOB SURVEY FORM

Location of Inspection: _____

Job No: _____ **Date:** _____

Inspection Conducted By: _____ **Time:** _____

JOB SAFETY EVALUATION

A job safety survey was conducted for the above named job and the following areas were evaluated.

1. JOB SITE EXPOSURES

- A. Elevation _____
- B. Traffic _____
- C. Environmental Exposures (weather, vegetation, insects) _____
- D. Adjacent Business/Construction _____
- E. Other _____

2. LOCATION AND ROUTE TO TREATMENT FACILITY _____

3. COLLECTION OF EMERGENCY PHONE NUMBERS

- Ambulance _____ Fire Dept _____
- Police Dept. _____ Utility Co. _____
- Telephone Co. _____ Other _____

4. MEASURES/ACTION ANTICIPATED TO REDUCE OR ELIMINATE EXPOSURES

RESPIRATORY PROTECTION PROGRAM

Introduction

The hazards and damage of inhaling chemical vapors into the lungs, nose, mouth and other internal organs are not always easily detected. In many cases by the time anything is noticed, the damage has already been done. We intend to provide a safe and healthy atmosphere for employees to work in. We, in compliance with OSHA regulations, have developed the following respiratory program.

The use of respirators is required whenever the situation warrants it. Ideally engineering control measures will be in place to eliminate the need for respirators. However, this is not always possible, and sometimes the only way to ensure employee safety is the use of a respirator. Remember, the respirator does not eliminate the hazard, it only shields you from it. If the respirator fails, then you could be exposed to lung hazards.

The type of operations an employee performs can change from job to job. Therefore the type of respiratory protection required can change from job to job. The proper type of respirator for use on a particular jobsite will be designated in the specific jobsite safety plan. As an example the following two procedures are defined for respirator use.

Spray Painting

1. Never use a respirator until you have been trained in its use and fit tested.
2. Select the correct model and style of respirator, and canisters, that will provide the proper protection from the hazards associated with the paint to be applied.
3. Depending on the type of paint, either full, or half face respirators will be required. These respirators will need to have the correct canisters screwed onto them. When installing canisters onto a mask, be sure to follow the instructions that came with it.
4. Remember, the canisters effectiveness reduced as it is used. At the first sign of increased effort to breath through the respirator, remove yourself from the operation, and replace the canisters on the mask or the entire disposable type mask.
5. If, while you are using the respirator, you ever smell any paint, remove yourself from the operation and I inform your superintendent. Do not reuse the respirator until it has been checked for leak, new canisters installed, and you have been re-fit tested for it.
6. Always inspect a respirator before you use it. Check For cracks in the rubber or lens,

check the straps, look at the overall integrity of the respirator. Make sure it has the appropriate canisters, and that was cleaned after its last use.

7. When through with the respirator, clean it with an approved cleaner/disinfectant. Place back in its storage box, and return it to its storage area. When in storage, the respirator must not be exposed to "fallout" of dust, dirt or other contaminants.

8. When applying aerosol can spray paints, (cold galvanizing, primers, touch up colors), in outdoor setting such as on the tower or ground, (keeping persons upwind and away from the fallout of the overspray) will allow for no exposure, thus allowing for no required use of a respirator, if desired.

9. Employees must always have their own individual respirator with them wherever they travel, to all work sites & locations along with their other P.P.E.

10. Before spray painting, you must be trained and authorized to perform that work.

OTHER CONTRACTORS OR SUBCONTRACTORS RESPONSIBILITIES

Any time another contractor brings hazardous substances onto a Jobsite the employer must receive MSDS's for these materials. Similarly, you as the employer must supply MSDS's for all hazardous substances in any area where the other contractor will be working.

SPECIFIC SAFETY RULES

1. VISUALLY INSPECT ALL TOOLS AND EQUIPMENT DAILY.
2. KEEP ALL TOOLS IN SAFE WORKING ORDER, REPORT ANY DEFECTS.
3. REPORT UNSAFE CONDITIONS TO IMMEDIATE SUPERVISOR.
4. PROMPTLY REPORT ALL INJURIES TO THE FOREMAN.
5. FOREMAN MUST COMPLETE AMERICAN RED CROSS FIRST-AID/CPR TRAINING.
6. BECOME FAMILIAR WHERE MEDICAL FIRST AID KITS ARE LOCATED ON TRUCKS.
7. BECOME FAMILIAR WHERE FIRE EXTINGUISHERS ARE KEPT ON EQUIPMENT.
8. USE EYE AND FACE PROTECTION WHERE THERE IS NEED, SUCH AS GRINDING AND WELDING.
9. DRESS PROPERLY, WEAR APPROPRIATE WORK CLOTHES, SAFETY STEEL TOED BOOTS AND HARD HATS.
10. NEVER OPERATE ANY EQUIPMENT UNLESS ALL GUARDS AND SAFETY DEVICES ARE IN PLACE AND PROPER OPERATING CONDITION.
11. PROPERLY CARE FOR, AND BE RESPONSIBLE FOR ALL PERSONAL PROTECTIVE EQUIPMENT.
12. BE ALERT AND KEEP OUT FROM OVERHEAD LOADS.
13. PRACTICE GOOD HOUSEKEEPING AT ALL TIMES, DO NOT LEAVE MATERIALS IN ROADS OR WORK PATHS.
14. ATTEND MONTHLY SAFETY MEETINGS.
15. THE USE OF OR BEING UNDER THE INFLUENCE OF INTOXICATING BEVERAGES OR ILLEGAL DRUGS IS PROHIBITED.
16. ALL POSTED SAFETY RULES MUST BE OBEYED AND MUST NOT BE REMOVED FROM JOB SITE.
17. COMPLY AT ALL TIMES WITH ALL KNOWN FEDERAL, STATE AND LOCAL SAFETY LAWS, EMPLOYER REGULATION AND POLICIES.

IT IS EXPRESSLY UNDERSTOOD THAT VIOLATIONS OF ANY OF THE ABOVE RULES CONSTITUTE CAUSE FOR IMMEDIATE DISMISSAL.

RF ENERGY EXPOSURE POLICY

- POLICY GOAL:** To prevent any person (whether staff, contract worker, or agents of Bell Tower Corporation) from entering any area in which high RF (Radio Frequency) energy levels in excess of ANSI (American National Standard Institute) guidelines are necessary present.
- IMPLEMENTATION:** This policy is to be implemented by all personnel and shall apply to all persons (staff, contract workers and any agents of Bell Tower Corporation).
- COMPLIANCE:** Compliance with this policy is mandatory by all persons. There are to be no exceptions whatsoever for any purpose.
- APPLICABLE LOCATION:** Any site entered upon by Bell Tower Corporation personnel known to have RF fields present. Requests shall be made to determine if said facility needs or should have an RF policy in effect.
- APPLICABLE LOCATION:** This policy is being implemented to insure Bell Tower Corporation compliance with appropriate federal regulations. IE: FCC Public Notice dated August 19, 1992 and the OST Bulletin # 65.
- EFFECTIVE DATE:** This policy shall take effect July 1, 1993, and shall continue in force until amended in writing.
- FUTURE POLICY REVISIONS:** This policy may need to be revised from time to time based on changes in operations, ANSI guidelines or a Federal Communications Commissions (FCC) or other regulatory agency requirements.
- POLICY DISTRIBUTION:** Copies of this policy are to be distributed to all personnel and to all companies performing subcontracting services for Bell Tower Corporation.
- OSHA POSITION:** OSHA has responded, with a favorable position, to the FCC's request of November 23, 1992 regarding protective clothing, specifically Naptex, for the uses intended for Broadcasting. (See copy following policy). In essence the letter states that the proper use of Naptex provides complete ANSI compliance to levels up to 125 mW/cm² above 65 MHz and up to 20 mW/cm² for frequencies below 65 MHz. Continued analysis may provide greater levels at Ch's 2 and 3 and frequencies below 65 MHz.
- ENFORCEMENT:** At any time when workers are to be on a tower, all transmitters at the site shall be put in local control and a responsible person shall be at the site to monitor power levels and location of on-tower workers; otherwise, the transmitters operation shall be locked out (plate voltage off, filament voltage off and main breaker off).

HIGH RF LEVELS:

The RF levels, which are expected to be above the ANSI standard, of all areas where any personnel or agent will be working must first be determined before the project can be started. This can be determined by using the Holaday #3012 with the HCH and MSE probes or the NARDA #8716 meter and the #88761 or #8731 probe. The locations that are above the ANSI standards can be identified by marking the area with a **“WARNING HIGH ENERGY RF LEVELS ARE ABOVE SAFE ANSI LIMITS”** or if on a tower you can state **“DO NOT ASCEND BEYOND THIS POINT – HIGH ENERGY RF LEVELS ARE ABOVE SAFE ANSI LIMITS”**.

For any work performed in these areas, either the worker must wear overalls made with NAPTEX material or all transmitters must be shut off (plate voltage off mode). (The transmitter filaments may be left on, if a responsible person is monitoring power levels at the site). Measurements taken inside the overalls made with NAPTEX material indicated that the worker could be in RF fields up to 125 mw/cm², above 65 MHz, without exceeding the ANSI limits.

EXCEPTIONS:

THERE ARE NO PERMISSIBLE EXCEPTIONS TO THIS POLICY.

SITE CONDITIONS:

RF energy levels at ground level are to be determined.

ADDITIONAL PRECAUTIONS:

If RF suits are required the suits must first be inspected to determine if there is any compromise to the integrity of the fabric.

A log of the activities concerning compliance with the RF policy must be included in the foreman's daily report, along with the serial number of the suit, overshoes, and gloves.

An initial “Tailgate Meeting” explaining and discussing the RF hazards of the job must be held prior to work beginning.

Any questions or concerns must be reviewed with the employees.

If it is deemed necessary, RF measurements are to be taken prior to beginning the job.

RF HAZARD SURVEY:

If an “RF HAZARD” survey has been conducted using field measurements of existing conditions present on the tower then attach a copy of the “HAZARD” survey for further information.

AUTHORITY:

This policy shall be deemed the minimum requirement. The existing station RF policy may supersede this policy and require a greater degree of compliance and shall be the governing policy for that project only. At no time shall a degree of accountability less than this policy exist.

SAFETY MEETINGS AND TRAINING PROGRAMS

This program is to insure that Bell Tower Corporation shall have a training and meeting program in place to adequately train all personnel in the area of civil, RF, Central Office and general installation safety practices to meet and/or exceed OSHA and Local Exchange Carrier requirements. (See Document Appendix)

1. All Bell Tower Corporation personnel shall attend a Safety Orientation Class within 45 days of being hired into the installation, tower, civil, site audit or administrative groups.
2. A record of attendance and list of safety topics covered will be a part of the employee's permanent personnel jacket.
3. Training shall be conducted to cover all aspects of the safety manual as well as quality assurance standards.
4. Upon promotion of personnel to superintendent, each superintendent will complete training that covers the superintendent's area of expertise.

Bell Tower Corporation has a program in place to define safety meetings procedures for all personnel. Safety and Quality Assurance Managers shall be responsible for the content of this document. All persons involved with activities of Bell Tower Corporation are responsible for compliance with this policy.

1. The purpose of safety meetings shall be to communicate general safety and central office safety procedures and discuss safety events and activities.
2. The meetings should rarely exceed 30 minutes.
3. Topics of discussion should not exceed three for any given meeting.
4. The meetings shall be documented to include the date, attendees, topics of discussion and follow-up issues.
5. The records shall document employee notification of new or changed procedures.

Safety meetings shall be held on the following schedule:

1. Daily meetings - Tailgate meetings to be held before work every day.
2. Weekly meetings - Discussion of highest degree of employee exposure hazards.
3. Job Site meetings - Meetings held by Supervisor prior to the start of a job and at the end of the job as a review process related to any and all safety events or issues experienced during the execution of the job.
4. Monthly meetings - Discussion of a moderate degree of exposure to occupational and site hazards.
5. Quarterly meetings - Low degree of exposure to occupational and site hazards.
6. New Employee instruction - Instruction of new employee to include policies and company rules and policies.

CONSTRUCTION SAFETY TOPICS

Near-miss Accidents
Accidents don't just happen
Accident prevention in construction work
General rules for safety work
Shortcuts
Sighs without words
Hand Traps
Ten basic safety rules
Safety Belts
Personal Protective Equipment
Eye Protection
Housekeeping Tips
Heat Stroke, Heat Exhaustion: Would You
Know What To Do?
Fire Extinguishers
Live Wires
Care of Hand Tools
Cold Chisels or Bull Pins
Power Tool Safety
Grinders and Abrasive Saws
Pneumatic Power Tools
Ladders
Mobile Crane Operations
Molded Two-and Three-Prong Plug Caps
Eye Safety
Defective Tools

Safety and Structural Steel

Suspended Loads
Straight Ladders
Rigging
Platform Hoists
Operator Alertness
Hand Tools
Defensive Driving
Lift Right. Lift Safely
Excavation and Backfill
Torsion Tools
Safe Handling of Compressed Gas Cylinders
Construction Equipment
Proper Lifting
Structural Steel Safety
Power Tools
Trench Excavation
Confined Space Hazards
Concrete Hazards
Storage of Compressed Gas Cylinders
Excavation
Floor, Roof and Wall Openings
Barricades and Warning Devices
Hazard Communications (Right to Know)
Trenching and Excavation Checklist
Working Safely With Concrete
Flammable and Combustible Liquids

Field Supervisors are required to give both weekly safety talks and daily tailgate safety talks.

EXAMPLE WEEKLY TAILGATE SAFETY TALK

HARD HATS

INTRODUCTION

1. Review any accidents or "near accidents" from the past week.
2. Describe the hazards of the work as they relate to your project. Explain or show the safe way of doing the job.
3. Ask for ideas about preventing accidents.
NOTE. If an idea is not practical explain the reason why.
4. Give the TAIL GATE SAFETY TALK

Example of Tail Gate Safety Talk

- a. The average safety hard hat weighs about 14 OUNCES. That isn't very much when you consider how much protection your hard hat provides.
- b. THE BRAIN IS THE CONTROL CENTER OF THE BODY. The slightest damage to any part of the brain may cause some area of the body to malfunction. The skull under normal circumstances protects the brain. But, when the possibility of injury from falling or flying objects exists, additional protection is required THIS IS THE REASON FOR USING HARD HATS.
- c.. The force of falling objects such as bolts, nuts, washers and tools can be incredible, depending upon the weight of the object and the distance of the fall. Should the object strike in unprotected head, the force of the blow could be enough to cause serious injury. When a hard hat is worn, the force transmitted to the neck and spine is often reduced to a lesser force which can be safely absorbed by the neck and shoulder muscles.
- d. Often, workers are reluctant to wear hard hats because of the weight and discomfort during warm weather.

Considering the protection afforded, THE WEIGHT BURDEN AT 14 OUNCES IS A SMALL PRICE TO PAY.

Regarding the discomfort of heat build-up when wearing hard hats, it just isn't so. A test at a temperature of 110 degrees showed that the inside temperature of hard hats varied from 5 to 12 degrees cooler than the outside air.

REMINDER HARD HATS GIVE YOU A SECOND CHANCE WHEN AN ACCIDENT HAPPENS. USE THEM TO KEEP YOURSELF SAFE ON THE JOB.

DISCIPLINARY ACTION

Any infraction of the above safety rules will result in appropriate disciplinary action being taken. Such disciplinary action will take the form of warnings, suspension or dismissal depending on the seriousness of the particular

1ST OFFENSE	The supervisor is to warn the employee and report the incident to the general manager.
2ND OFFENSE	The employee is to be immediately sent off site and will not be allowed to work for a time specified by the company. The employee will not be paid per diem for the duration of his suspension. The event is to be chronicled on the Daily Time sheet and in the employee's personnel file,
3RD OFFENSE	The employment of the person can be subject to suspension or termination immediately and could be sent home. Disciplinary action will be determined based upon each case.
4TH OFFENSE	Same as the 3rd offense.

Exceptions to the 4-step progressive discipline policy shall include, but not be limited to:

1. Falsification of employment application
2. Use of alcohol or non-prescription drugs while on duty
3. Vandalism of company equipment or property
4. Theft of company equipment
5. Loss of any license, necessary to perform work

EMERGENCY RESPONSE TO HAZARDOUS SUBSTANCES

If any substance is found of unknown origin, company policy is to **LEAVE IT ALONE!** Immediately evacuate the area, and contact the nearest hazardous material response team. Don't allow employees on site until declared safe by the response team.

FIRST AID

- Arrangements must be made **BEFORE** starting the project, to provide for prompt medical response in the event of an emergency
- In areas where severe bleeding, suffocation, or severe electrical shock can occur, a 3-4 minute response time is required
- If medical attention is not available within 4 minutes, then a first aid trained person must be available on the jobsite at all times
- An appropriate, weatherproof first aid kit must be on site. It must be checked weekly
- Provisions for an ambulance or other transportation must be made in advance
- Contact methods must be provided
- Telephone numbers must be posted where 911 is not available

Bell Tower Corporation has designated jobsite foremen as having adequate training to render first aid in the event of a medical emergency in areas where emergency response time is in excess of 4 minutes. They will maintain appropriate first aid kits and check them weekly to assure they are properly stocked.

First aid kits are located at the following locations:

- Business Office at Corporate Headquarters
- Located by water fountains in the manufacturing areas
- Each company vehicle on jobsite.
- Every employee shall be trained in emergency procedures:
 - Evacuation plan
 - Alarm systems
 - Shutdown procedures for equipment
 - Types of potential emergencies

It is Bell Tower Corporation's responsibility to review their job sites addressing all potential emergency situations.

<p style="text-align: center;">EMPLOYEE EMERGENCY ACTION PLAN: FIRE & OTHER EMERGENCIES</p>
--

1. **Emergency Escape Procedures:** Immediately leave the building through the closest practical exit. Meet up at the foreman's truck.
2. **Critical Plant Operations:** Shut off the generator on your way out if possible, otherwise evacuate the building.
3. **Accounting for Employees:** Foreman/Supervisor is to account for all employees after Emergency evacuation has been completed and assign duties as necessary.
4. **Means of Reporting Fires and Other Emergencies:** Dial 911 on the cell-phone, report the location of the emergency and provide directions to the responders.
5. **Further Information:** Contact the Safety Coordinator or further information or explanation of duties under the plan.

ALARM SYSTEMS/EVACUATION: Bell Tower Corporation establishes the call; Fire, Fire, Fire: by any employee, as the signal to immediately evacuate the building/facility for: fire or other emergencies.

Training: Before implementing the emergency action plan, a sufficient number of persons to assist in the safe and orderly emergency evacuation of employees will be designated and trained.

The plan will be reviewed with each employee covered by the plan at the following times:

- Initially when the plan is developed or upon initial assignment
- Whenever the employee's responsibilities or designated actions under the plan change
- Whenever the plan is changed

The plan will be kept at the worksite and made available for employee review.