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SAFETY POLICY AND CODE OF SAFE PRACTICES Issued: 6/16/2015			

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1.0 **Introduction**

The purpose of this Safety Policy & Code of Safe Practices (“the Policy”) is to provide guidance and requirements for matters of health and safety regarding the working environment of employees, subcontractors, agents, and independent contractors (collectively, “Personnel”) of Constellis Holdings, LLC and its subsidiaries and affiliates (collectively, the “Company”). This Policy is intended to promote a safe, healthy, and productive work environment. This Policy outlines the Company’s commitment to Safety Management by establishing a dedicated effort to integrate disciplines such as safety, emergency management, security operations, and general operational conduct into manageable and workable practices at all levels. These principles are outlined to ensure missions are accomplished safely and securely.

2.0 **Scope**

This Policy applies to all Personnel, and compliance is required as a condition of continued work with the organization. More information regarding this Policy, safety initiatives in the workplace, and consequences that may result from violations of this Policy is available from the Constellis Safety Department, which can be reached via e-mail at safety@constellis.com.

3.0 **Safety Policy**

Safety at the Company is a top priority. Within this Policy, the term “safety” is used to describe protections in conjunction with environmental safety, health, waste minimization, and pollution prevention. Our Company, in collaboration with all levels of employment, will continuously develop, refine, and provide guidance about the health and safety of our working environment. We will promote a safe, healthy and productive work environment for our employees, our business partners, and the communities where we

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have operations. To this end, in addition to the requirements of this Policy, Personnel shall comply with local, state and Federal safety and health regulations or host country laws and regulations. This includes program standards, contract standards and any special safety concerns identified by the company. If there is a conflict between an established company policy and a government regulation or third-party contract requirement, the more stringent requirement shall apply. Violation of this policy could result in disciplinary action up to and including termination.

The Company desires a safe and healthy working environment and mandates that Personnel be responsible for ensuring tasks are conducted in a safe and efficient manner consistent with this Policy. To accomplish this, the Company must constantly be aware of conditions in work areas that may produce injuries or hazards. Personnel cooperation in detecting hazards, controlling hazards, and minimizing their negative effects is a necessary step towards accident prevention. The following general guidelines govern all Personnel and Company operations.

3.1 Company Safety Directives for Personnel

- 3.1.1** Personnel must inform their supervisor immediately if any situation appears beyond their ability or authority to correct or control.
- 3.1.2** Personnel must work safely in a manner that ensures adequate protection of workers, the public, and the environment; further, Personnel shall be accountable for the safe performance of the work performed.
- 3.1.3** Personnel must comply with all approved safety standards, regulations, and procedures that apply to their work.
- 3.1.4** Personnel must take precautions to prevent injuries to themselves and/or others.
- 3.1.5** Personnel must only perform those tasks they are trained and authorized to perform.
- 3.1.6** Any Personnel known to be under the influence of alcohol and/or drugs shall not be allowed on the job while in that condition. Any Personnel suspected of being under the influence of alcohol and/or drugs may be required to submit to testing in accordance with the Company's Drug and Substance Abuse Policy.
- 3.1.7** No Personnel shall be permitted to work while impaired (physically or mentally) in a manner that may unnecessarily expose the individual and/or others to injury.
- 3.1.8** Specific tasks shall be planned, briefed, and supervised to prevent injuries, particularly when working with dangerous equipment, handling dangerous materials, or traveling through or to high-risk areas (higher than normal day-to-day operations).
- 3.1.9** Personnel shall immediately report any personal injury or property damage to their supervisor regardless of the amount of damage and irrespective of cause or fault.
- 3.1.10** Personnel must immediately report any potentially dangerous or hazardous situations, including, but not limited to, activities that may result in injury, death, or damage to property damage, to supervisors immediately.
- 3.1.11** Personnel should provide recommendations or solutions to minimize potential accidents or unsafe working conditions.

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3.2 Supervisor Responsibilities

Supervisors should set examples of safe practices by their own conduct, specifically:

- 3.2.1** Supervisors should know, observe, and enforce all general and special safety rules or instructions for their department or project.
- 3.2.2** Supervisors should retain administrative and operational control to prevent and mitigate hazards associated with the work being performed.
- 3.2.3** Supervisors should ensure that Personnel possess the experience, knowledge, skills, and abilities that are necessary to perform their responsibilities.
- 3.2.4** Supervisors should communicate Policy information to Personnel within their respective organizations.
- 3.2.5** Supervisors should involve Personnel in the work activity planning processes at the beginning, continuously throughout, and at the end of such activities. Throughout the process, there will be implementation suggestions and feedback opportunities.
- 3.2.6** Supervisors should ensure that before work is performed, the associated hazards are evaluated and an agreed upon set of standards and requirements are established to mitigate risk.
- 3.2.7** Supervisors should insist that Personnel observe and obey safety rules, regulations, and orders and will take the action necessary to obtain compliance.
- 3.2.8** Supervisors should investigate unsafe conditions which have been flagged, fix such conditions when possible, and inform the Project Management.
- 3.2.9** Supervisors should instruct new Personnel on safety, carefully observe them at their work, and remind Personnel of relevant safety instructions and practices.
- 3.2.10** Supervisors should assess and report all personal injuries and illnesses sustained on the job by the Personnel within their area of responsibility, and investigate and report all incidents of property damage.
- 3.2.11** Supervisors should ensure that Personnel have and use personal protective equipment (“PPE”) as required by applicable laws and/or contract requirements, and will ensure that all PPE equipment remains in a safe and proper working condition.
- 3.2.12** Supervisors should evaluate Personnel based on their adherence to this policy as identified in their annual performance evaluation (if applicable).

3.3 Constellis Management and Safety Committee Responsibilities

- 3.3.1** The Company will monitor this Policy for effectiveness and improvement opportunities.
- 3.3.2** The Company will ensure this Policy is reviewed annually and updated as required to reflect current operations.
- 3.3.3** The Company will ensure that this Policy will define specific scopes of work, identify and analyze hazards, develop and implement hazard controls, perform work within controls, and provide or improve safety management operations.
- 3.3.4** The Company will review this Policy for its safety performance objectives, performance measures, and commitments consistent with company expectations in coordination with

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Company program and budget execution guidance and direction.

- 3.3.5** The Company will distribute safety information to Personnel via established communication mechanisms (e.g., Guard Muster, concurrent training, quarterly safety meetings, staff meetings, monthly HSE Newsletter, information on [Constellis' Safety SharePoint site](#), etc.)
- 3.3.6** The Company will ensure that this policy is integrated with the Company's business processes for work planning, budgeting, authorization, and execution.
- 3.3.7** The Company will integrate environmental, safety, and health standards into work planning and execution clauses in subcontracts involving work on-site at a customer owned or leased facility.

3.4 General Safety Rules for All Personnel

- 3.4.1** All Personnel must follow safety rules applicable to their job and use safety devices and personal protective equipment as required and directed.
- 3.4.2** All Personnel must be alert to see that protective practices and procedures are being followed. All deficiencies must be reported promptly to a supervisor.
- 3.4.3** The Company does not condone or tolerate horseplay, scuffling, or other acts that may endanger the safety or well-being of Personnel.
- 3.4.4** Only authorized Personnel are allowed to operate machines and equipment for which qualification is necessary.
- 3.4.5** All Personnel must obey all posted warning and/or instructional signs.
- 3.4.6** All Personnel must ensure clear access to fire extinguishers, fire hoses, sprinkler valves, electrical panels, exits, and other safety measures requiring immediate access. Report any blockage to your supervisor immediately upon discovery.
- 3.4.7** All Personnel must report any defective, damaged, or missing safety or protection equipment to a supervisor immediately upon discovery.

These rules are meant to be general rules for Company operations, and are not meant to be all-inclusive. Additional departments, programs, or projects may require more detailed or specific rules and regulations. Additions, modifications, or amendments to these rules may be made if deemed necessary for the safety and well-being of Company Personnel.

4.0 Additional Safety Procedures or Requirements

Additional department, program, or project safety rules may be implemented as required by law, by contract, or to sustain safe and efficient Company operations. Any additional rules should be communicated to relevant Personnel and be consistent with the directives already outlined. The Constellis Safety Department shall have the responsibility to coordinate development of safety and health procedures or programs in the interest of a safer work environment or to meet specific requirements.

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5.0 Reporting Safety Concerns or Violations

Any safety-related concerns or violations of this Policy or other safety-related measures should be reported to a local safety representative, the employee's supervisor, the Company hotline at safetyhotline@constellis.com, to the Constellis Ethics Hotline at www.constellis.ethicspoint.com, or any other relevant department via the Company's Open Door Policy.

RELATED DOCUMENTS

- **Constellis Domestic Safety, Health, and Injury and Illness Prevention Plan**
- **Code of Business Ethics and Conduct**
- **Open Door Policy**
- **Drug and Substance Abuse Policy**
- **Program or site-specific Safety Plans**

VERSION HISTORY

	Version	Version Date	Author	Description
1	1.0	06/16/15	Tiffany Brown	Initial version
2	1.1	06/22/16	B. Underhill	Updates to Safety POCs made throughout, minor format updates
4	2.0	9/16/2020	Tiffany Brown	Moved to Risk Management and Updated to include Constellis Safety Policy and changed title to Safety Policy and Code of Safe Practices