



Flex-N-Gate Group of Companies

CHSP.00015 – Safety Policy Code for Contractors, Visitors & Suppliers

Document Owner: Steven Stancil

This document covers the minimum safe work practices in regard to fire, safety, security, health, environmental and traffic regulations that govern contractors and subcontractors while working within the confines of any Flex|N|Gate facility (the “Work Site”). These requirements are considered as additions to any safety rules or regulations of the contractor. The contractor shall be responsible for informing each member of their team and all subcontractors of fire, safety, security, health, environmental and traffic requirements and standards at all Flex|N|Gate facilities.

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Contractors are responsible for the conduct of their personnel while on Flex|N|Gate property. Failure to maintain proper standards of conduct at all times may and will result in immediate removal of contractor personnel from Flex|N|Gate property.

Upon request, contractors are responsible for providing Flex|N|Gate Systems with their Injury and Illness Prevention Program (IIPP) prior to start of job. Contractors shall prepare, communicate to its employees, and enforce the Injury and Illness Prevention Program.

If you have questions regarding safety requirements, or about the safety of a particular operation or activity, contact your supervisor or your employer's Safety Officer. Your Designated Project Manager or Flex|N|Gate Health & Safety Representative are available for consultation or questions regarding Health & Safety.

DEFINITIONS

"Flex|N|Gate Project Manager" means the individual within Flex|N|Gate who has the responsibility of managing the contract and the project the contractor is working on.

"Designated Project Manager" means the individual who has been delegated the responsibility of managing the contract and the project the contractor is working on.

"Flex|N|Gate Loss Prevention Representative" means the designated individual within Flex|N|Gate who is responsible for managing Flex|N|Gate's Environmental Health and Safety Program.

INSURANCE REQUIREMENTS

The following requirements apply to all independent contractors working at any Flex-N-Gate facility worldwide. All certificates and registrations shall be reviewed and retained by the Flex-N-Gate facility prior to the contractor beginning work.

- US contractors shall provide Flex-N-Gate a current Certificate of Liability Insurance.
 - The following levels of coverage are required at a minimum:
 - General Liability: \$1,000,000 (Each Occurrence)
 - Worker's Compensation: \$500,000 / \$500,000 / \$500,000 (Max paid per accident / Max paid per disease / Max paid per employee)
- Canadian contractors shall provide Flex-N-Gate a Clearance Certificate issued by the Workplace Safety and Insurance Board (WSIB).
- Mexican contractors shall provide Flex-N-Gate a Registration Certificate with the Instituto Mexicano del Seguro Social (IMSS).

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GENERAL INFORMATION

1. EMERGENCY NOTIFICATION PROCEDURES/ACCIDENT REPORTING

- In case of any accident, injury or illness, always contact your Flex|N|Gate Project Manager at the Work Site.
- Contractors are responsible for providing first aid to their employees, along with providing first aid related equipment.
- If a serious accident has taken place on Flex|N|Gate property, the contractor shall immediately notify the Flex|N|Gate Project Manager, then submit a written accident report. The report should be directed to the Flex|N|Gate Project Manager, as well as the local general manager. This written report must be received no later than 24 hours after the incident.

2. AISLES AND STAIRWAYS

- Contractors must comply with applicable requirements established by law.
- Stairways and aisles must remain free of debris and cleaned up before, during and after work is performed.

3. HAZARD COMMUNICATION (HAZCOM)

- Contractors must maintain an effective program in compliance with applicable requirements established by law.
- Safety Data Sheets (SDS's) for all chemicals must be submitted to the project Manager, and approved prior to use.
- All chemicals must remain labeled using acceptable labeling methods such as GHS, HMIS or NFPA formatting.

4. CHEMICALS/CHEMICAL SAFETY

- The Contractor will not dispose of any chemical waste or solutions containing chemicals on Flex|N|Gate property without first consulting with the Flex|N|Gate Environmental representative.
- Chemical waste includes, but is not limited to:
 - Acids, bases
 - Adhesives, glues, cements, epoxies
 - Bleaches, cleaners, detergents
 - Compressed and liquefied gas

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- Core solder (acid, resin)
- Fluxes
- Greases, oils
- Paints, dyes, pigments, fillers
- Pesticides, herbicides
- Solvents, thinners
- Fluorescent tubes (Local governing rules apply)
- VDT's
- Empty containers that once contained any chemicals (refer to SDS)
- Chemical wastes will not be dumped into storm drains, industrial waste or sanitary waste drain systems.
- Drains, sewers, sinks, rest rooms, trenches, trashcans or the ground shall not be used for disposal of chemicals.
- Job sites must be cleaned up when completed and unused or left-over items removed. General trash such as wood, nails, plastic wrap, etc. must be removed from the job site and disposed of properly.
- The facility Environmental Representative **MUST** be consulted regarding disposal of any and all regulated or chemical wastes. The Environmental Representative can be contacted through the designated Project Manager.
- The contractor is responsible to provide copies of manifests and any other documentation with regard to waste removal, transport and disposal.

5. COMPRESSED GAS CYLINDERS

- All compressed gas cylinders shall be legibly marked with the name of the material contained. Cylinder marking shall conform to the current American National Standards Institute (ANSI) standards and be marked by means of stenciling or stamping.
- The Contractor will not store gas cylinders on any Flex|N|Gate premises. Any unusual circumstances which may require cylinder storage must be reviewed and have prior approval of the Designated Project Manager and Environmental Representative.
- Compressed gas cylinders will be secured (roped or chained to an immovable object) in an upright position at all times, except when cylinders are being

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transported. All cylinder movement must be properly conveyed with hand carts with secured cylinders. Movement with other conveyance means is strictly prohibited, e.g. Forklifts.

- Valve protection caps will be firmly installed (hand tight) when compressed gas cylinders (empty or full) are transported or stored.
- Cylinders will be kept a safe distance or shielded from welding and cutting operations.
- Cylinders will not be placed where they can contact an electrical outlet.
- Gas cylinders may not be stored inside office areas.
- The correct regulators, in proper working order, shall be used for each type of gas. And shall not be modified in any way.
- Cylinder valves will be closed when work is finished and when cylinders are empty or are being moved.
- If a gas cylinder develops a leak, immediately remove it to a safe location outside the building. If the leak cannot be corrected, call the Designated Project Manager.

6. CONFINED SPACE ENTRY

- Each contractor must comply with confined space entry requirements established by applicable law. If the scope of work the contractor is involved in involves confined spaces, contractors are required to include a written confined space plan. This plan must be provided to the designated Project Manager.
- Work in permit required confined spaces requires a contractor generated “CONFINED SPACE ENTRY PERMIT”. Permits must be reviewed by the Designated Project Manager prior to entry into a confined space. The contractor shall provide the required personnel safety equipment and competent persons.
- All work inside permit required confined spaces requires the following safety precautions at a minimum: Additional requirements may be added based on hazards involved in particular jobs.
 - Everyone involved must be trained!
 - A written permit
 - Use of an attendant outside the space and entry supervisor
 - Proper PPE for the job (ie: hard hats, fall protection, respiratory protection, safety glasses, hearing protection, gloves, chemical protection, safety-toe)

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boots, etc.)

- Air monitoring within the space
- Sufficient lighting and communications between the entrant and attendant
- A rescue plan

7. CONTROL OF HAZARDOUS ENERGY (LOCKOUT/TAGOUT)

- All contractors must comply with applicable lockout / tagout requirements established by federal, state and local laws. Flex|N|Gate Project Managers will provide all contractors who are engaged in electrical work a copy of our Lock Out/Tag standard if required.
- If the scope of work the contractor is involved in involves hazardous energy requiring the use of lockout / tagout procedures, the contractor must provide the Project Manager with a copy of their Energy Control Plan for review.
- The contractor **MUST** communicate with the project manager regarding questions on what, where, when and how to **PROPERLY** lockout equipment. Much of the equipment used within Flex|N|Gate facilities is very technical and requires precise shutdown / start-up procedures in order to protect both personal and equipment from damage. The Flex|N|Gate project manager **MUST** be consulted and involved in communicating these procedures to contractors prior to work being performed.
- Lockout tags will identify the contractor's company name, date and the locked out employee's name.

8. EXCAVATIONS AND TRENCHING

- All contractors must comply with applicable requirements for trenching and shoring established by federal, state and local laws.

9. FLOOR / WALL OPENINGS

- All contractors must comply with applicable requirements established by federal, state/province and local laws.
- Floor openings and penetrations greater than 2" (5cm) must be covered/protected. Appropriate signage/warning - Danger! Floor Hole Cover – Do not Remove
- Floor or wall openings must be guarded to prevent accidental access and fall

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hazards using a standard barrier (railing) consisting of a top rail at 42 inches, mid rail (between the floor and top rail) and toe board. The standard barrier (railing) must be constructed to support a minimum of 200 lbs in any direction.

- Caution, or barrier tape may be used as a visual aid, but alone is NOT sufficient in guarding off floor or wall openings.

10. HELICOPTER LIFTS

- Any proposed usage of helicopters to hoist, set, install or move equipment or materials must have prior approval from the Designated Project Manager.
- Helicopter lifts may require a permit from the local jurisdiction (city or county). The entire building must be evacuated prior to a helicopter lift.

11. LADDERS

- All contractors must comply with applicable requirements established by federal, state/province and local laws.
- Ladders must be inspected for damage before use and removed from Flex|N|Gate property if found to be damaged in any way.
- Ladders must be held, and/or tie-off procedures used, to reduce or eliminate fall hazards.
- Ladders of the correct height and style must be used as appropriate for specific jobs.
- At no time may workers stand on the top rung/step of any ladder.

12. SPECIFIC HAZARD AREAS / SAFE WORK PLANS

- There are certain areas and operations on the Flex|N|Gate site where extra precautions must be taken due to the nature of the hazard.
- Before entering into, or working on or in, any of the following situations, the contractor is required to check with the Designated Project Manager for a review of applicable safety, security and health rules. The contractor must also submit to the Designated Project Manager a written "SAFE WORK PLAN".
 - Working at heights, in ceiling areas or building roofs;
 - Installation, removal or modification of electrical, or gas systems;
 - Machinery installation, removal or modification;
 - High voltage electrical areas;

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- Work involving hazardous chemicals;
- Excavation or trenching;
- Work inside confined spaces (as defined in section 6);
- Areas involving chemical hazards such as plating, laboratories, waste treatment areas, etc.

Contractors shall take appropriate measures to safeguard and control pedestrian traffic into or near construction areas

13. HOUSEKEEPING

- Work areas must be kept neat and orderly AT ALL TIMES, for both safety and security reasons.
- Material should be carefully stacked and located so that it does not block aisles, doors, fire extinguishers, fire blankets, eyewash stations, first aid boxes, fixed ladders, electrical equipment or stairways. Boxes are not to be stacked over 4 feet high.
- Do not allow your tools, equipment and materials to impact areas occupied by Flex|N|Gate.
- Clean up all non-hazardous liquid spills and drips immediately. Hazardous material spills should not be handled without the proper equipment and training. All Hazardous Materials spills are to be immediately communicated to the Site Designated Project Manager and the Flex|N|Gate Environmental Representative
- Concrete form and scrap lumber and all other debris will be kept clear of all work areas.
- Combustible scrap, waste materials and debris will be removed from the building on a daily basis, preferably at the time of strip-out.
- Overhead storage of debris, tools, equipment, pipes, etc. is prohibited.
- No loose material will be left in the area above suspended ceiling panels.
- Interior construction areas will be swept clean and all trash will be removed at the end of each workday.
- The work area will be kept free from any potential tripping hazards and nails protruding from boards must be removed.

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- All ceiling tiles removed by the contractor will be replaced immediately after the work is completed, in an undamaged condition.

14. OVERHEAD WORK / FALL PROTECTION

- No overhead work will be performed when, as a result of that work, the possibility of a falling object injuring any person exists.
- Relocation of personnel will be accomplished prior to and maintained throughout the overhead work period.
- The contractor will make all personnel relocation requests to the Designated Project Manager.
- Contractor personnel are not permitted to crawl along ductwork, cable trays, piping or other building structures.
- Overhead hazard areas will require the wearing of hard hats for those entering the area.
- Fall protection (harness, lanyard, lifelines, etc.) is required for elevated work requiring personnel to be at levels above 4 feet from an adjacent level without the protection of a standard barrier (as defined in section 9 “Floor / Wall Openings”).
- Do not secure fall protection systems to equipment such as sprinkler pipes, utility piping or electrical conduit, since they do not have enough structural support.
- Appropriate anchor points which meet OSHA regulations must be used for fall protection systems.
- Fall protection is required during use of personnel lifting devices such as JLG lifts, Cherry pickers, etc. when elevated above 4 feet in the US, 3m in Canada or 1.8m in Mexico.
 - SCISSOR LIFTS ONLY - Fall protection equipment (harness and lanyard) shall be utilized in scissor lifts which have factory installed anchor points.
- Forklifts may not be used to lift people.

15. PERMITS AND APPROVALS – WORK AUTHORIZATIONS

- The contractor must work with the Project Manager ensuring that all required permits and approvals are secured before work begins. Such permits may be

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required by local / state agencies such as building permits or electrical permits. Others may be required by OSHA or Flex|N|Gate Health and Safety, such as hot work permits or confined space entry permits.

- Any work which will require any part of the sprinkler system to be deactivated requires special permitting and reporting to Flex|N|Gate’s property insurance company. Before proceeding with this work your project manager must be informed.

16. PERSONAL PROTECTIVE EQUIPMENT

- All contractors must comply with applicable requirements established by federal, state/province and local laws.
- Contractors are expected, and required, to provide all PPE to their employees based upon the site’s PPE requirements.
- The employees of contractors are required to wear required PPE at all times while working on Flex|N|Gate property.
- PPE must be inspected and in safe working condition at all times.

17. ROOF WORK

- All contractors must comply with applicable requirements established by federal, state/province and local laws.
- Before accessing a roof, contractors must have approval from the Project Manager.
- While working on rooftops, contractors are expected to follow the guidelines in Section 14 “Overhead Work / Fall Protection of this document.
- Systems such as: fall arrest systems, warning line systems, buddy systems and guardrail systems are expected, and must be used by contractors, in order to provide protection to their employees while working on rooftops on Flex|N|Gate properties.
- Special hazards such as conduits, piping, ducting, skylights, scrubbers, HVAC, etc. must be identified and guarded to prevent accidental exposure while working on rooftops.

18. WELDING / HOT WORK

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- Any welding, cutting, soldering or other open flame work, either inside or outside on Flex|N|Gate property, must utilize a “Hot Work Permit” in order to document procedures followed to reduce fire hazards.
- Permits must be obtained from the Designated Project Manager.
- The contractor will continue the operation only as long as conditions remain safe.
- All combustible materials in the area must be protected or removed before beginning work. Fire blankets and other preventive devices must be used in order to reduce the fire hazards during hot work.
- An approved fire extinguisher must be within reach of all hot work operations and other open flames.
- Contractors must provide fire extinguishers for use during their hot work operations, except in emergencies.
- The contractor is responsible for seeing that a fire watch is maintained throughout the hot work operation, and for a designated time afterward as directed by the hot work permit.
- The fire watch is responsible for taking appropriate action to prevent a fire, to extinguish incipient fires, and to summon assistance from emergency services if any fire is noticed and/or cannot be extinguished.
- Non-combustible or flameproof shields or screens must be placed around the work to shield others from eye damage and protect from direct welding rays or arc.
- Exhaust ventilation is required when performing welding or cutting in confined spaces, or where fumes may present a health hazard or nuisance exposure to you, Flex|N|Gate employees or others.

19. UTILITIES

- It is important that your work does not affect utility services to the Flex|N|Gate premises – particularly those in occupied areas.
- Contractor(s) must not operate any switch or valve, which controls building services, processes or equipment unless contractor(s) supervisor has obtained written authorization from the Designated Project Manager.
- A lockout/tagout system, which complies with government regulations, along with section 8 of this document, must be used to identify and secure switches

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and controls in the “OFF” position while work is being performed

20. WARNINGS / SIGNAGE

- Warning, Danger, Caution, Notice and other safety and security signs, notices and barriers are posted for your protection. They must be observed and followed at all times.
- When the work being performed has the potential to expose Flex|N|Gate employees or others to hazards, contractors must provide warning signs, barriers or barricades wherever such protection is required by this document, or where safe practice dictates it.
- Where signs and barricades do not provide adequate protection, flagmen (or other additional) protection is required. Multi-lingual signage may be required.

SECURITY

1. IDENTIFICATION BADGES

- When you report to work on Flex|N|Gate premises, you will be issued a temporary identification badge that will designate you as a visitor / contractor, authorizing you to enter Flex|N|Gate controlled space.
- A Flex|N|Gate identification badge is required to be worn in plain sight at all times by all visitors and contractors working on Flex|N|Gate premises.
- The badge must be returned to the Security Post or lobby where it was issued upon departure from Flex|N|Gate premises.
- Unauthorized use of this badge – such as giving it to another person – is prohibited.
- Contractors assigned to work at Flex|N|Gate on a long-term, daily basis may also need to submit required paperwork and have their pictures taken and wear a Flex|N|Gate picture badge. Contact the Designated Project Manager to arrange this.
- Contractors are responsible for the accountability and proper use of access cards and badges issued to them and their personnel. Direct any badging questions or problems to the Designated Project Manager.

2. PROHIBITED / RESTRICTED ITEMS

- Alcoholic beverages, non-prescription drugs or prescription drugs for non-

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medical use, firearms, ammunition or any other material considered a weapon are not permitted on Flex|N|Gate property.

- Smoking is strictly prohibited in all Flex|N|Gate buildings, including the roof.

3. CONTROLLED ACCESS

- For Security reasons, entry and exit of Flex|N|Gate buildings is restricted to those areas designated as your work area. Entrance to an area other than where you are working is prohibited, unless authorized by the Designated Project Manager.
- Building emergency exits are to be used only in the event of an emergency.
- Without exception, there should never be an occasion for a secured card access, emergency or any other secured doors to be left propped open, unattended, or unlocked.
- Contact your Flex|N|Gate Designated Representative before opening and entering any roof access areas.

4. SMOKE DETECTORS

- The Contractor is cautioned that there are many areas throughout Flex|N|Gate that contain smoke detectors. These detectors are sensitive to smoke, dust and other airborne particles, that can either, hamper proper operations or cause them to alarm. Examples of smoke detector locations are: computer rooms, cafeteria's training and meeting rooms, return air ducts and adjacent to fire doors and corridors.
- The Contractor must evaluate the conditions that may result from any operation/condition that may produce smoke, dust, flying or other airborne particles must be previously approved by the Designated Project Manager.
- The Contractor will ensure all appropriate parties, Loss Prevention, Designated Project Manager, local site contact, etc... are notified when working in an environment with active smoke detection equipment.
- If the work requires the Contractor to encapsulate individual smoke detectors, he/she will ensure all accessible smoke detectors, within the work area, are bagged prior to any work. The Contractor shall also ensure that at the end of each workday that all bags are removed from the smoke detectors.

5. PARKING / SPEED LIMITS

- Contractor(s) shall follow parking arrangements as instructed by the

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Designated Project Manager.

- Contractor vehicles will be parked in designated parking areas only.
- Parking in reserved spaces, patios, walkways, sidewalks, in front of any buildings or roadways is strictly prohibited.
- Improperly parked vehicles will be towed at the owner's expense.
- Loading dock areas may be used for loading and unloading, but afterwards the vehicle must be moved to the designated parking area.
- 8 mph (12 km/h) speed limit will be observed at all times while driving in Flex|N|Gate parking lots and roadways.
- Oversized vehicles, such as dump trucks, garbage trucks, ready-mix rigs, etc. must be equipped with audible back-up alarms.

Standards and Conduct

- Contractors are to provide to Flex|N|Gate/or designee, and pay all fees for, all permits, inspection or occupancy certificates, maintenance and operation manuals, equipment, warranties, etc.
- Should the Contractor perform any work that does not comply with the requirements of applicable codes and standards, they shall bear all costs that arise in correcting such defects.
- All Contractors are required to supply Flex|N|Gate/or designee with an appropriate & valid Certificate of Insurance covering Workman's Compensation and Liability Insurance before they can work in the building. It is the responsibility of the General Contractor to monitor compliance.
- Contractors must maintain existing plumbing, heating, air conditioning, fire protection, and other existing systems, and must retain all existing functions in service except for scheduled disruptions. Preferably, all such disruption(s) of system functions should be performed after normal business hours or on the weekend.
- All work involving core drilling, spraying, or other function that may cause disrupting noise, fumes, or odor, or result in necessary access to any occupied spaces, must be approved by the Designated Project Manager.
- All penetrations of piping, duct work, conduits, etc. through walls, partitions, and floors shall be sealed to building code requirements to maintain the integrity of the

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structure's fire safety rating. Also, any openings in walls and partitions made by the Contractor for access to construction work shall be patched and/or repaired to Flex|N|Gate's satisfaction. All core drill pieces are to be removed by the Contractor, with the exception of fire sprinkler penetrations, which should be attached to the pipe for the inspector to witness.

- It shall be the responsibility of each trade to cooperate fully with the other trades on the job to keep the job site in a clean and safe condition. At the end of each day's work, each trade shall properly store all of their tools, equipment, and materials and shall clean up their debris from the job site.
- The contractor shall provide a final clean-up of the job site including walls, light fixtures, windowsills, counters, floors, etc.
 - (i) Sweeping Compound will be used when sweeping to minimize the raising of dust. Failure to use sweeping compound may result in the mandatory halting of work as enforced by Flex|N|Gate's designated personnel.
 - (ii) Contractors are responsible for removing all construction debris from the site. The Flex|N|Gate/or designee trash facility will not be used for construction debris. Contractor will be back-charged for unauthorized use of Flex|N|Gate/or designee trash facility.
 - (iii) The building janitorial service may be contracted for clean-up work.
- Contractors shall not utilize electrical/telephone rooms, mechanical rooms, or other unauthorized buildings or areas for storage of tools, equipment, materials, supplies, etc.
- Contractors shall be restricted to designated toilet facilities. Under no circumstances are these facilities to be used for purposes other than their intent (no tool cleanup, etc.).
- Contractors shall not lounge or eat in the building lobbies, hallways, or stairwells. Breaks may be taken either in the assigned work area, or in common areas such as a restaurant or snack bar to be determined by the Designated Project Manager. It is the contractor's responsibility to ensure good housekeeping practices are enforced.
- Radios, stereos, TV's, etc. are prohibited, along with personal audio devices such as MP3 players, ipods, etc.
- Pictures are not to be taken within Flex|N|Gate facilities without prior approval of the Plant Manager or General Manager.

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- Cursing, rough housing, leering, or other objectionable conduct shall result in the immediate halting of work and expulsion from the premises.
- Proper attire is required.
- Monitoring of Compliance with the above stated rules and regulations will be done by Flex|N|Gate/or designee.

GENERAL RULES

All printed documents are considered not controlled. Controlled documents are available in Flex-N-Gate’s Corporate Document Control Systems.

IF YOU ARE NOT SURE OF THE SAFETY RULES THAT APPLY TO YOUR CONTRACT, PLEASE CONTACT YOUR DESIGNATED PROJECT MANAGER.

FAILURE TO COMPLY WITH SAFETY GUIDELINES MAY RESULT IN REMOVAL OF THE CONTRACTOR FROM FLEX|N|GATE PREMISES.

Change History				
No.	Reason for Change	Changed By	Rev.	Date
1.	Initial Document Release	Steve Stancil	1	12/13/16
2.	Updated section on risk assessment	Steve Stancil	2	4/5/17
3.	Added Visitors and Suppliers to title and updated format.	Steve Stancil	3	11/6/18
4.	Added insurance requirements, added General Rules	Steve Stancil	4	2/22/2022
5.	Updated requirements related to working at heights using aerial lifting devices in section 14 “Overhead Work / Fall Protection”.	Steve Stancil	5	11/30/2023