

Vendor and Contractor Safety Plan

**Igloo Products Corp.
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Introduction

The purpose of the Igloo Products Corp. Vendor and Contractor Safety Plan is to minimize personal injuries and property losses during vendor and contractor activities on the Company property. Igloo Products Corp. (Igloo) will provide oversight, leadership and support necessary and consistent with OSHA requirements. Igloo seeks to meet or exceed the applicable requirements of OSHA Standards and EPA/TCEQ Regulations. The requirements contained in this plan are established to ensure maximum protection for Igloo associates, visitors, vendors, contractors and the environment.

Igloo will provide the oversight leadership and support necessary and consistent with the OSHA Voluntary Protection Program (VPP) requirements. The elements of the OSHA VPP: Employee Involvement and Managerial Leadership, Safety and Health Training, Worksite Analysis, and Hazard Prevention and Control are integral elements to the Igloo Safety Program. Igloo intends to participate in the OSHA Voluntary Protection Program and achieve the OSHA Star. As a vendor or contractor at Igloo, you are expected to support this initiative through compliance with the Company's safety requirements.

Policy

It is the policy of Igloo to provide and maintain a safe and healthful working environment. As a vendor and contractor at Igloo, it is imperative that you not compromise worker safety and health for profit or production. Igloo accepts responsibility for providing a safe work site for vendors and contractors. However, vendors and contractors must personally be responsible for planning and executing work in a safe manner. At Igloo, satisfactory safety performance is a condition for employment. We are committed to a safe, healthy, and drug free workforce; our objective is the elimination of job-related injuries and illnesses. As a vendor or contractor on this project, you agree to abide by this same policy.

Scope

The Vendor and Contractor Safety Plan includes policies for the safe operation of machinery and equipment, work planning, accident and near miss investigation, hazard recognition and abatement, and conduct of associates. The duties and responsibilities outlined in this plan will be in effect through the duration of vendor and contractor activities at the Company.

The requirements contained in the plan are applicable to personnel working at Igloo under contract or purchase order. This plan will be revised as changes in plant configuration, procedures, or safety requirements dictate.

Vendor or Contractor Onsite Safety Presence

In order to maintain orderly and safety compliant activities, it is necessary for vendors and contractors to name a Safety Representative for each project at Igloo. This person serves as the primary point of contact for all safety issues and shall be someone that will be onsite during work activities. The Igloo Safety Department will conduct oversight audits during the project. This vendor or contractor safety representative will be provided with findings and/or recommendations for improvement. Igloo Safety reserves the right to stop work activities in the event of a hazard that is immediately dangerous to life or health. Safety deficiencies will be discussed in weekly progress meetings with vendors and contractors. Vendors and visitors are required to provide information on actions taken to address deficiencies.

Worker Protection

Igloo Products Corp. is committed to the principle of accident prevention. The safety and protection of associates, visitors, and the public is the first priority. Work that is not safe shall not be performed. Every employee, including vendors and contractors, has the right and the responsibility to identify unsafe conditions without fear of reprisal. Furthermore, if any employee perceives an imminent danger they shall stop and/or refuse to work and immediately notify their supervisor or a Safety Representative. Rules must be diligently followed and questions of safety shall be resolved BEFORE work begins.

Hazard Identification

Hazard identification shall be initiated during the planning phase of each project. The process shall continue through execution as a combined effort of Igloo, vendors, and/or contractors. At the worksite, associates are responsible for identification of hazards associated with their work.

Hazard Reporting

It is expected that vendors and contractors will report any hazards or perceived unsafe conditions or practices. This will help in the early identification and remediation of situations that could result in accidental injury or illness if left unchecked. Employees of vendors and contractors shall report hazards to their supervisors. However, the hazards may be discussed with Igloo Safety personnel if it affects the safety of workers while on the Igloo campus.

Hazard Prevention and Control

Hazard prevention is dedicated to the elimination of hazards through design and planning. Prior to work in the field, preparatory meetings will be conducted. These meetings are known as Kickoff Meetings. During these meetings, specific job hazards

will be discussed in detail and methods of hazard prevention will be incorporated into the appropriate work documents.

The preferred order of hazard control is:

- a. Engineering controls
- b. Administrative controls
- c. Personnel Protective Equipment

Hazard Communication

Igloo maintains a Hazard Communication Program Plan. All Igloo associates, vendors, visitors, and contractors are included in this plan. The Hazard Communication Program Plan is based on compliance with the OSHA Hazard Communication Standard. It is intended to inform and protect personnel from potential health hazards associated with the use of hazardous chemicals.

Igloo shall inform vendors and contractors of the chemical hazards they might be exposed to while on the project. Employees of vendors and contractors may have access to Material Safety Data Sheets (MSDS) for chemical products maintained by Igloo. Compliance Centers with binders containing MSDS are located in every facility containing hazardous chemical and maintained by Igloo.

Vendors and contractors at Igloo are required to submit Material Safety Data Sheets for every chemical product they want to bring onto the project prior to bringing the item onsite. Igloo shall review the MSDS and determine if the chemical can be safely used on the project. Vendors and contractors must maintain a copy of the MSDS at the worksite for all chemicals approved for use on the project.

Accountability of Vendors and Contractors

Adherence to the requirements of the Igloo safety program is required from every employee. For Igloo personnel, accountability is reinforced through the Performance Appraisal System. For vendors and contractors, accountability is contractually prescribed. Safety rule compliance is a condition for continued access to the Igloo campus. Vendors or contractors that are found to have deliberately violated safety requirements shall be prohibited from working for the Company.

Contractors and vendors are required to actively participate in the “Zero Accident” concept to ensure compliance with OSHA and Igloo requirements. Contractors and vendors must provide a safe and healthful environment for their personnel on the project and safeguard the public and environment from hazardous situations that could occur as a result of their operations. Contractors and vendors must attend Kick-off Meetings and other meetings held by the project in the interest of safety health.

Job Safety Analysis

Job Safety Analyses are an analytical method that is applied to jobs involving higher levels of risk. The JSA identifies specific hazards, necessary precautions, and required personal protective equipment. It is then used as part of the pre-job briefing to cover features of work. Work conducted by vendors and contractors shall be covered by JSA. Igloo Safety will assist vendors and contractors with the development of Job Safety Analyses, when necessary. The JSA must be complete and a copy given to Igloo Safety before the start of the work. A copy of the JSA format is located at Attachment A.

Hazardous Work Permits

The Hazardous Work Permit system is a process of utilizing several types of permits to review and control unique and/or high-risk jobs. The types of permits include confined space, lockout/tagout, excavation, and hot work. Vendors and contractors shall obtain these permits before performing any activity where a permit is required. Vendors and contractors should notify the contract or construction oversight representative in advance of requiring one of the permits listed above.

Confined Space Entry

Igloo has established a confined space evaluation and permit program to protect workers when entrance into confined areas is necessary for the performance of work activities. A confined space is defined as a space with **ALL** of the following characteristics: large enough and so configured that a worker can bodily enter the space and perform assigned work; has limited or restricted means for entry or exit; and is not designed for continuous employee occupancy. Igloo conducts frequent confined space inventories to ensure confined spaces are properly labeled. However, if you are unsure if a space is a confined space and it is not posted, you should contact Igloo Safety before breaking the plane (placing any part of the body through the entrance to the space).

Workers must contact Igloo Safety to perform a confined space evaluation when access to a potential confined space is necessary. Igloo will determine if the area is a confined space or not. If it is a confined space, Igloo will determine if the space can be down posted where a permit is not required. This determination is made by conducting air monitoring and evaluation configuration and other hazards of the space. If the space is determined to be a "Permit-Required Confined Space", workers must be properly trained in accordance with 29 CFR 1910.146. Vendors and contractors may attend Igloo's Permit-Required Confined Space training course. However, our training program is only to allow workers to enter confined spaces on the Igloo campus. Vendors and contractors may work under their own confined space procedures provided those procedures have been provided to Igloo Safety for review and approval.

Safety Signs and Barricades

Safety signs are used to identify known hazards. As a vendor or contractor at Igloo, you are expected to abide by all posted safety signs. Vendor and contractor activities that represent a hazard to Igloo associates shall be barricaded appropriately to prevent unauthorized entry into the hazard area. Barricaded areas shall be totally enclosed to ensure personnel can not accidentally enter the area.

Types of barricade used at the Igloo include: nylon rope, wire rope, guardrails, plastic tape (Danger and Caution), and orange grid netting. All barricades shall be accompanied by an accident prevention tag or sign (Caution, Warning, or Danger) to alert associates of the hazard that exist and the person to contact if entry to the barricaded area is required. As a rule, barricades should not be crossed unless permission has been obtained by the individual(s) responsible for the barricades.

Accident/Incident Investigation & Reporting

Igloo is committed to investigating OSHA Recordable injuries, First Aid cases, and near miss incidents. This effort is intended to identify casual factors, root causes, and corrective actions. All vendors and contractors will take an active part in the investigations and prepare statements and reports. Reports will include detail of remedial action taken and recommendations to prevent a recurrence.

All injuries and illnesses that occur on the job shall be immediately reported, by the affected person if possible, to Igloo Safety. Please use the emergency numbers attached to notify the proper authorities.

Igloo maintains a list of approved medical providers for treatment of injured workers. Vendors or contractors may have access to this list if they choose. If a vendor or contractor has a preference for medical treatment at an offsite facility, they should notify Igloo Safety if transport to that facility is necessary. Injuries must be reported to Igloo Safety even if they do not treat the injured individual.

As a policy, any vendor or contractor involved in an accident at Igloo is subject to drug/alcohol testing. Igloo promotes a drug and alcohol free work environment.

Vendors and contractors are to complete the Igloo Supervisor's and Employee's Accident Report forms in the event of an accident or injury on the campus. These reports must be completed and returned to the Safety Department within two hours of the event.

Employee Safety Training

Knowledge and motivation are considered to be the essence of safe work habits, which reduce the occurrence of job related injuries. Igloo is committed to providing the training necessary to enable the work force to perform in as safe a manner as possible. As a

vendor or contractor on the project, you are expected to provide the training required by the Occupational Health and Safety Administration for workers involved in various activities. This training includes, but is not limited to: fall protection training, permit required confined space training, electrical safety training, scaffolding training, and respiratory protection training. Igloo may request vendor and contractor programs such as respiratory protection. It is our obligation to ensure worker safety while on the Igloo campus. With that said, Igloo shall not allow companies to perform work activities if they have not met the training requirements listed in 29 CFR 1910 and 29 CFR 1926.

Emergency Response

The ability of workers at Igloo to promptly take appropriate action in the event of an emergency is essential to their safety and well being. The response to emergencies will vary with the type of emergency and activities in progress. The Igloo Safety Manager is responsible for management of the Emergency Response Program. The responsibilities associated with the Emergency Response program include the prevention of worker casualties, protection of the surrounding communities and government property, and minimization of adverse effects on the environment. The Igloo Emergency Response Plan provides the requirements and guidance for personnel action during an emergency.

As a vendor or contractor at Igloo, you are responsible for following the directions of Igloo emergency response personnel in an emergency. Vendors and contractors are required to sign in when they report to work on the campus. This is the method of accountability used for personnel at Igloo. Vendors and contractors may be required to participate in drills and exercises to show readiness in the event of an emergency.

A listing of emergency telephone numbers is attached to this plan.

Personal Protective Equipment

Substitution, minimization, engineering, and administrative controls are the concepts Igloo implements to reduce worker exposure to hazards. The need for and use of Personal Protective Equipment is only considered after the other options are exhausted. Vendors and contractors are expected to provide their employees with PPE as required for worker protection. Where safety signs require PPE, vendors and contractors are to comply.

As a general rule, safety glasses and hearing protection are required in Igloo manufacturing areas. The noise level in those areas dictates the use of hearing protection. At any time while walking through the manufacturing area you may encounter eye hazards. Therefore, the safety glasses requirement is enforced. Failure to follow this guidance will result in the violator being barred from the Igloo campus.

Vendors and contractors are encouraged to train their employees in the inspection, maintenance, and use of Personal Protective Equipment. Personal protective equipment

such as safety glasses, safety shoes, and hard hats shall be approved by the American National Standards Institute (ANSI).

Fire Protection and Prevention

Igloo has established a fire protection and prevention program to protect personnel from injury and destruction due to fire. Prevention is the only effective means of reducing the likelihood of damage due to fire. All personnel are encouraged to be aware of situations that could lead to fire, and immediately report any fires to the fire department, their supervisor or the Igloo Safety Department.

Vendors and contractors at Igloo shall support this program. Hot work permits are required for all work involving spark or flame producing devices.

In the event of an incident/accident involving fire, the person or persons discovering the fire will alert personnel in the facility or area and contact the fire department. Workers should only attempt to extinguish incipient (newly initiated, small) fires. Employee safety is imperative. Evacuation of the facility or area and notification of proper authorities is key.

Vehicle Safety

Vendors and contractors are responsible for the condition of vehicles to be used on the project. Vendors and contractors should expect all vehicles to be inspected by Igloo security personnel. Vendors and contractors are expected to provide proof of insurance and registration for their vehicles. All drivers must be properly licensed. Vendors and contractors shall abide by all posted traffic signs. Speeding on the Igloo campus is not tolerated.

Vendors and contractors will be asked to remove vehicles from the site that are found to have leaks such as gas, oil, brake fluid, or hydraulic fluid.

If a vendor or contractor is involved in a vehicular accident at Igloo, an accident investigation will be conducted and the parties involved will participate in the investigation. Vendors and contractors shall report these events to Igloo Safety immediately after occurrence.

Lockout/Tagout

The control of hazardous energy (electricity, hydraulic, pneumatics, and rotating parts) is essential to worker protection when maintenance or repair of machinery and equipment is necessary. Igloo has developed a comprehensive Lockout/Tagout Program. The Igloo Lockout/Tagout Program is focused on preventing injuries and property damage that could result from the unexpected startup of machinery and/or equipment.

Vendors and contractors with their own lockout/tagout programs shall submit their programs for review by Igloo Safety. Those vendors and contractors without lockout/tagout programs may work under the Igloo Lockout/Tagout Program provided they attend the Lockout/Tagout course. Regardless, Igloo shall perform the energy isolation for equipment and machinery within the Igloo Facility; this does not include facilities outside of the Katy Campus maintained by Igloo. Vendors and contractors may conduct energy isolation under their own program at these facilities provided their program has been approved by Igloo Safety. When Igloo conducts the energy isolation, vendors and contractors shall be briefed on the program and be allowed to hang their locks on the lock box(es) associated with the work activity.

Violation of the Lockout/Tagout Program is prohibited and will not be tolerated.

Tools and Equipment

Workers at Igloo are required to ensure the tools and equipment they use are safe to operate. To accomplish this, workers are required to inspect all tools and equipment before use. Any tools or equipment found to be unsafe to use or operate shall be removed from service and repaired if possible. As a vendor or contractor at Igloo, you are required to comply with this guidance.

As a policy, hand held powered tools used at Igloo will be equipped with spring-loaded or constant pressure switches that shut off the tool when released. Hand held power tools with toggle switch type “on and off” controls will not be used unless a tool with a constant pressure or spring-loaded trigger is not available and safe work practices have been implemented for worker protection.

Workers using electric tools in outside locations shall be protected through the use of a Ground Fault Interrupter. Tools used for work around energized electrical equipment shall be non-conductive. Tools used for work in hazardous atmospheres shall be non-sparking. Igloo Safety personnel will make visits to vendor and contractor work areas, and tools and equipment may be inspected. If defective equipment or tools are found, the vendor or contractor will be asked to take the item out of service.

Rented equipment and tools used by vendors and contractors at the Igloo shall be in good safe operating condition. Aerial lifts, forklifts, and the like shall be used as intended and the manufacturer’s instructions for use shall be followed. Forklifts, boom trucks, and cranes shall be operated by qualified personnel and shall not be subjected to loads over the manufacturer’s rated load capacity. Mobile equipment (aerial lifts, forklifts, etc.) shall be equipped with movement alarms and/or flashing lights when audible alert is not feasible due to high noise levels.

Waste Management and Environmental Safety

Vendors and Contractors are responsible for any chemicals products brought on the Igloo campus. It is a requirement to have Material Safety Data Sheets for the products being

used on Company property. Those MSDS must be provided to Igloo Safety prior to work commencing. Vendors and contractors must use sound handling practices to ensure chemical products are not released into the environment while working at Igloo. Proper disposal methods must be followed for waste. Waste may not be disposed of at Igloo. Vendors and contractors should take any wastes left over from the project with them at project completion. Igloo will seek legal action against any company found to improperly dispose of chemical waste on Company property.

Vendor and Contractor Access and Identification

The security of the Igloo campus is very important as we strive to provide a safe and comfortable workplace for our associates. As a vendor or contractor, you are being allowed access to our facilities. As a condition of granting you access, you must sign in and out with the receptionist or Igloo Security everyday you report for work on the campus. You will be given an identification badge that you are required to wear while on property. The identification badge is to be returned to the receptionist or Igloo Security when your work is completed on the property. Vendors and contractors are asked not to wander into areas outside of their immediate work area. Any personnel found in unauthorized areas without approval will be asked to leave the worksite.

Attachments

Job Safety Analysis Format
Emergency Telephone Numbers

Emergency Telephone Numbers

Igloo Security

(713) 584-6565 – Katy North Desk Phone

(713) 584-6303 Katy South Desk Phone

(713) 208-2918 – Katy South Cell

Igloo Products Corp. Safety & Environmental

Al M. Payton

(713) 584-6550

(713) 208-3015 (cell)

Maricela Arellano

(713) 584-6885

(713) 208-3028 (cell)

Will Trent

(713) 584-6355

(713) 208-2994 (cell)

Dial 911 for Immediate Emergency attention, but notify Igloo Security also