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# CORPORATE HANDBOOK

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# Our Company

At Hi-Tech Electric Company, we take pride in exceeding our customer's expectations in a prompt, professional, and cost-effective manner. We have continually grown in a slow controlled manner to maintain our quality of work and integrity of supervision.

Since 1987, our company has strived to give each job and every customer the personal attention they deserve. Through electrical services available on your site or ours and strong partnerships with other local businesses, we can meet your deadlines and work within your budget to complete your project. We are continually looking for new and better products to improve overall value.

# **Our Customers**

Hi-Tech Electric Company is very proud to share with you a list of some of our satisfied customers. We support large corporations and many locally owned businesses with the same level of service and respect. A sample of our customer base includes:

- Abbott Laboratories/Ross Products Division
- Pfizer
- John Tapper, Inc.
- Kalsec
- Kalamazoo College
- Elite Companies
- Plaza Corp
- American Axle

# Our People

Hi-Tech Electric Company values our employees' experience and knowledge and strives to create a positive work environment. Through continuous learning and advancement opportunities for our employees, we continually train quality workers dedicated to providing our customers with the best service possible.

Our Estimators and Project Managers have an average of 20+ years of experience in the electrical field. Our Field staff consists of State licensed Journey- man and state registered apprentices and we provide ongoing safety and skills training for continuous improvement.

Our promise to our customers is to provide a safe, skilled, drug and alcohol free, documented work force. We provide full benefits with all employees fully insured.

Hi-Tech Electric 839 Lenox Ave. Suite A Portage, MI 49024 Phone 269.323.1111 Fax 269.323.7956 www.hi-techelectric.net



# Industrial Services

We can provide a complete solution for nearly all industrial electrical needs. Our partnership with HTSE (Hi-Tech Systems Engineering) enables complete solutions for virtually all controls and processes. We have been doing automation and control work since 1987 and have completed projects with all major controls products and processes.

Besides process controls we have completed numerous projects for the process of water and waste. Purified water, RO water, Cleaning in Process with caustic chemicals, etc. just to name a few.

We have also provided numerous solutions for better management and control of the HVAC systems, Lighting Systems, Access Control Systems, CCTV Systems, Fire Alarm Systems, Data Systems, Phone Systems, Fume Hood Controls, to name a few.

# **Commercial Services**

Our commercial accounts get all our expertise from the industrial group plus the extra attention to service needed for this sector of the industry.

We have qualified, competitively priced, employees that bring first-class workmanship combined with <u>timely</u> installations required by the commercial customer.

Commercial accounts can expect our managers to take ownership and pride in your facility and help the owners or managers run and maintain the facility in the most cost-effective way possible.

We offer 24/7 service and pride ourselves on our quick response time to whatever your problem may be. Large or small, the attention remains the same for all our valued customers.

# Our Promise

A family-owned company since 1985, it is our sincere promise to deliver the best products and services for all our customers. We have grown to a very sizeable and respected company by remembering those who helped get us where we are today.

Sincerely, Shart Thank

Chad Hur President

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#### EQUAL EMPLOYMENT OPPORTUNITY STATEMENT

Hi-Tech ("Hi-Tech") provides equal employment opportunities (EEO) to all employees and applicants for employment without regard to race, color, religion, gender, sexual orientation, national origin, age, disability, marital status, or any other protected characteristic. Hi-Tech complies with applicable state and local laws governing nondiscrimination in employment in every location in which the company has facilities. This policy applies to all terms and conditions of employment, including hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

Hi-Tech expressly prohibits any form of unlawful employee harassment based on race, color, religion, gender, sexual orientation, national origin, age, disability, marital status or other protected characteristics. Improper interference with the ability of Hi-Tech employees to perform their expected job duties is absolutely not tolerated.

#### ANTI-HARASSMENT POLICY AND COMPLAINT PROCEDURE

Hi-Tech is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, Hi-Tech expects that all relationships among people in the office will be business-like and free of bias, prejudice and harassment.

It is the policy of Hi-Tech to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, religion, gender, sexual orientation, national origin, age, disability, marital status or any other protected characteristic. Hi-Tech prohibits any such discrimination or harassment.

Hi-Tech encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of Hi-Tech to promptly and thoroughly investigate such reports. Hi-Tech prohibits retaliation against any individual who reports discrimination or harassment or who participates in an investigation of such reports.

#### **DEFINITIONS OF HARASSMENT**

Harassment based on any protected characteristic is strictly prohibited. Under this policy, harassment is verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, religion, gender, sexual orientation, national origin, age, disability, marital status, or any other characteristic protected by law or that of his/her relatives, friends or associates, and that a) has the purpose or effect of creating an intimidating, hostile or offensive work environment; b) has the purpose or effect of unreasonably interfering with an individual's work performance; or c) otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group and that is placed on walls or elsewhere on the

employer's premises or circulated in the workplace, on company time or using company equipment via e-mail, phone (including voice messages), text messages, tweets, blogs, social networking sites or other means.

#### SEXUAL HARASSMENT

Sexual harassment constitutes discrimination and is illegal under federal, state and local laws. For the purposes of this policy, sexual harassment is defined, as in the Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or c) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment may include a range of subtle and not-so-subtle behaviors and may involve individual of the same or different gender. Depending on the circumstances, these behaviors may include unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, whistling or touching; insulting or obscene comments or gestures; display in the work place of sexually suggestive objects or pictures; and other physical, verbal or visual conduct of a sexual nature.

#### INDIVIDUALS AND CONDUCT COVERED

These policies apply to all applicants and employees, whether related to conduct engaged in by fellow employees or someone not directly connected to Hi-Tech (e.g., an outside vendor, consultant or customer). Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

#### **COMPLAINT PROCESS**

Individuals who believe they have been the victims of conduct prohibited by this policy statement or who believe they have witnessed such conduct should discuss their concerns with their immediate supervisor, or if not comfortable reporting to their supervisor to the Branch Manager.

When possible, Hi-Tech encourages individuals who believe they are being subjected to such conduct to promptly advise the offender that his or her behavior is unwelcome and request that it be discontinued. Often this action alone will resolve the problem. Hi-Tech recognizes, however, that an individual may prefer to pursue the matter through complaint procedures.

Hi-Tech encourages the prompt reporting of complaints or concerns so that rapid and constructive action can be taken before relationships become irreparably strained. Therefore,

although no fixed reporting period has been established, early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment.

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

Confidentiality will be maintained throughout the investigatory process to an extent consistent with adequate investigation and appropriate corrective action.

#### RETALIATION

Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action. Acts of retaliation should be reported immediately and will be promptly investigated and addressed.

Misconduct constituting harassment, discrimination or retaliation will be dealt with appropriately. False and malicious complaints of harassment, discrimination or retaliation may be the subject of appropriate disciplinary action.

# AMERICANS WITH DISABILITIES ACT (ADA) AND THE ADA AMENDMENTS ACT (ADAAA)

The Americans with Disabilities Act (ADA) and the Americans with Disabilities Amendments Act, known as the ADAAA, are federal laws that prohibit employers with 15 or more employees from discriminating against applicants and individuals with disabilities and that when needed provide reasonable accommodations to applicants and employees who are qualified for a job, with or without reasonable accommodations, so that they may perform the essential job duties of the position.

It is the policy of Hi-Tech to comply with all federal and state laws concerning the employment of persons with disabilities and to act in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC). Furthermore, it is our company policy not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training or other terms, conditions and privileges of employment.

Hi-Tech will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of a job unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation and/or if the accommodation creates an undue hardship to Hi-Tech.

#### EMPOLYEE RIGHTS UNDER THE RIGHT TO KNOW LAW

- Access To Msds (Via Fax)
- Knowledge Of Hazardous Chemicals In The Work Place

- Emergency Procedures In Case Of Over Exposure To Hazardous Chemicals
- Understanding The Relevant Data Contained On The Msds
- Access To The Company's Chemical List Kept At The Main Office Or Jobsite

# **CODE OF CONDUCT (STATEMENT OF POLICY)**

The management and employees of Hi-Tech Electric Company shall conduct themselves in a business like and professional manner. Employees are expected to work within a teamwork concept.

High quality work that is done in a neat and workmanlike manner is the company goal. It is also a company goal to maintain an excellent employee / management relationship. To do this, both parties must do their best to be fair and open-minded. Please remember that the door to upper management is always open to any employee with a work related or personal problem that may impact your performance in the workplace.

The following shall constitute rules and regulations to supplement working agreements with the IBEW and the various local unions:

- 1. Hi-Tech Electric Company is signatory with N.E.C.A. and several IBEW working agreements. All employees are expected to comply with the applicable agreement.
- 2. The use of tobacco products will be allowed only at coffee and lunch breaks if designated areas are available. The use of tobacco products will not be allowed on job sites or in company vehicles.
- 3. No illegal drugs are to be used, transported or distributed while employed by Hi-Tech Electric Company.
- 4. Gambling on job sites is not allowed.
- 5. Consumption of alcohol is not allowed during work hours.
- 6. All employees are expected to maintain a neat and workmanlike appearance.
- 7. Employees are to be in their work areas and ready for work at the designated starting time.
- 8. Employees are to notify the office, foreman, or tool partner as soon as possible in case of lost time (i.e. appointments, sick time, or vacation).

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- 9. Employees do not have the authority to give away company tools, equipment or materials.
- 10. Employees shall be paid for actual time worked. Early quitting, late starts and long lunch breaks with full day's pay will not be allowed.
- 11 Journeyman electricians will always carry their applicable license with them while on the job site.

- 12. Apprentice electricians will carry their Electrical Apprentice Registration card with them at all times while on the job site.
- 13. When driving company vehicles, employees are to follow all governing laws, wear seat belts and be courteous to others. Any traffic violations received while driving company vehicles are the responsibility of the employee. Any damage to a company vehicle is to be reported immediately.
- 14. It is the intent of this company to maintain equipment, tools, and vehicles. It is the employee's responsibility to notify management of all problems.
- 15. Employees are not to use vulgar or profane language with or around customers or fellow employees.
- 16. The customer is always right. There will be no disagreements between the employee and the customer. All disagreements will be directed to management.
- 17. All substandard work is to be reported to management.
- 18. Hi-Tech Electric Company is an equal opportunity employer and conducts its employment practices within the applicable State and Federal equal opportunity regulations.
- 19. Any Hi-Tech Electric employee, management, staff, or vendor to Hi-Tech Electric Company will not tolerate any form of discrimination, harassment or retaliation.
- 20. Continued absenteeism is counter-productive towards the goal of customer satisfaction and will not be tolerated.

IT IS THE INTENT OF THIS DOCUMENT TO STATE THE RULES, REGULATIONS, AND POLICIES, WHICH EMPLOYEES ARE TO ABIDE BY. ANY VIOLATIONS IN REFERENCE TO THIS ARTICLE OR UNION ARTICLES WILL RESULT IN THE FOLLOWING DISCIPLINARY ACTION.

FIRST VIOLATION- Verbal warning (Notification to be inserted in personnel file)

SECOND VIOLATION- Written warning (Have the employee sign warning and place a copy in his/her personnel file

THIRD VIOLATION- Termination or suspension without pay at manager's discretion

THE FOLLOWING ARE EXAMPLES OF WORK VIOLATIONS THAT WILL RESULT IN IMMEDIATE TERMINATION OF EMPLOYMENT:

- 1. Participating in a fight during working hours.
- 2. Insubordination (Direct violation of an order).
- 3. Immoral conduct or indecency.
- 4. Engaging in sabotage or espionage.

- 5. Theft or removal from premises, without proper authorization, any customer property, company property, or property of another employee.
- 6. Unauthorized possession or use of firearms, explosives or any other concealed weapon during assigned working hours.
- 7. Possessing, using, selling, or distributing alcoholic beverages or illegal drugs on company premises, job sites, or in company vehicles.

THIS LIST SHALL NOT BE CONSTRUED TO DENY THE RIGHT OF THE COMPANY TO DISCIPLINE ANY EMPLOYEE FOR AN ACT OR CAUSE NOT MENTIONED.

# Company Office and Field/Shop Dress Code Policy

#### 1. PURPOSE

To maintain a safe, healthy, clean, and functional work environment, Hi-Tech Electric Company requires that employees wear clean and appropriate clothing for the job. Our dress code policy provides guidelines and some restrictions on acceptable attire in the workplace.

#### 2. SCOPE

This policy applies to all employees who work from our offices or in public and who may encounter customers, colleagues, visitors, or members of the public in the course of their duties. This includes off-site, off-site activities and activities outside of normal working hours when representing Hi-Tech Electric Company.

#### 3. POLICY

Dress, grooming and personal cleanliness standards contribute to the morale of all employees and have an impact on the company's image. Hi-Tech Electric Company wants employees who represent the organization or who work on the company's premises to have a professional look and to wear appropriate clothing for the workplace.

During business hours or when representing Hi-Tech Electric Company, you are expected to present a clean, neat, and tasteful appearance. You should dress and groom yourself according to the requirements of your position. This is particularly true if your job involves dealing with customers or visitors in person.

Where necessary, reasonable accommodation may be provided for a person with a disability.

The following personal appearance guidelines should be followed for OFFICE staff:

- 3.1 Office Acceptable Clothing Business Casual
  - Dress shirts, sweaters, blouses, button-down shirts, polo shirts, sports coats
  - Khakis, trousers, jeans, skirts, slacks, dresses
  - Any shirts, pants, or dresses that are not excessively tight or revealing
  - Clean shoes, including sneakers, boat shoes, sandals, or boots
  - Respectable clean hats
- 3.2 Office Unacceptable Clothing at all times
  - Shorts
  - Any excessively revealing clothing
  - Torn and/or holey jeans
  - Tank Tops
  - Shirts showing midriff

# Office Unacceptable Clothing at all times - continued

- T-shirts with graphics
- Athletic leggings, sweatpants, or joggers
- Hooded Sweatshirts
- Flip flops
- 3.3 Office Casual Friday acceptable clothing included in addition to 3.1
  - Athletic Shoes
  - Hi-Tech branded shirts
  - Crew neck sweatshirts

The following personal appearance guidelines should be followed for FIELD and SHOP staff:

# 3.4 Field and Shop Guidelines

- Clothing worn on the job shall not be objectionable to the customer, fellow employees, or employers and should be appropriate for the work being performed and the conditions encountered.
- Clothing that is torn, ragged, dirty, or contains lewd, obscene, or suggestive content is prohibited.
- Jewelry & Accessories such as chains, necklaces, earrings, watches, or conductive materials are discouraged if they pose a safety threat.
- Head and facial hair must be clean and well-kept. Long hair should be restrained for safety.

# **Labor and Human Rights Policy**

# 1. Policy Statement

Hi-Tech Electric Company is committed to upholding the highest labor and human rights standards across its operations and supply chain. We ensure that all employees, contractors, suppliers, and business partners adhere to ethical labor practices, aligning with the International Labor Organization (ILO) conventions, the United Nations Guiding Principles on Business and Human Rights, and the Dhaka Principles for Migration with Dignity. This section provides a high-level overview of the policy. For complete details, including specific procedures, requirements, and guidelines, please refer to the Safety Manual. In the event of any discrepancies, the Safety Manual shall take precedence.

# 2. Scope

This policy applies to all employees, subcontractors, suppliers, and business partners engaged in business activities with Hi-Tech Electric, irrespective of geographical location.

# 3. Commitments and Operational Objectives

#### 3.1 Child Labor

- Hi-Tech strictly prohibits child labor in all operations and supply chains.
- Compliance with ILO Convention No. 138 and local regulations regarding the minimum age of employment.
- Suppliers and contractors must verify the age of employees and maintain records to prevent underage labor.

#### 3.2 Forced Labor and Human Trafficking

- Zero tolerance for forced, bonded, or indentured labor, including human trafficking.
- Prohibition of recruitment fees, withholding of personal identification documents, and involuntary overtime.
- Implementation of robust due diligence procedures to identify, assess, and mitigate potential forced labor and human trafficking risks in our supply chains.
- Immediate remediation measures for any identified forced labor cases, including engagement with NGOs and victim support programs.

# 3.3 Freedom of Association and Collective Bargaining

- Respect for employees' rights to form or join trade unions and engage in collective bargaining.
- No discrimination or retaliation against employees exercising these rights.

- Establish mechanisms for constructive dialogue and negotiation with employee representatives or unions.
- Establish mechanisms for constructive dialogue and negotiation with employee representatives or unions.
- Ensure that company policies and practices do not discriminate against employees based on their union membership or participation in trade union activities.
- Provide training and support for employees, supervisors, and managers on the rights and benefits of freedom of association and collective bargaining.

# 3.4 Occupational Health and Safety

- Providing a safe, healthy, and hazard-free work environment for all employees, contractors, and visitors.
- Compliance with applicable health and safety laws, regulations, and industry standards.
- Conducting risk assessments, implementing controls, and regularly reviewing health and safety performance.
- Providing appropriate training and resources to promote a culture of safety and prevent work-related injuries and illnesses.

# 3.5 Diversity, Equity, and Inclusion

- Prohibition of discrimination and harassment based on race, gender, age, disability, sexual orientation, or any other protected characteristic.
- Promotion of an inclusive workplace where all employees have equal opportunities for growth.

## 3.6 Working Conditions and Fair Wages

- Compliance with applicable wage laws, including minimum wage, overtime, and benefits.
- No excessive working hours beyond legal and industry standards.
- Transparent contracts and clear communication of employment terms.

# 4. Due Diligence and Monitoring

Hi-Tech Electric is committed to upholding the highest standards of labor and human rights across our operations, partnerships, and supply chains. To identify, prevent, and mitigate risks, the following due diligence procedures shall be embedded into our business practices:

#### 4.1 Risk Identification and Assessment

• Internal Operations Review: Conduct regular audits of workplace conditions, health and safety practices, and employment terms to ensure alignment with applicable labor

- laws and international human rights standards (e.g., ILO Conventions, UN Guiding Principles on Business and Human Rights).
- Supplier and Contractor Risk Mapping: Screen all suppliers, subcontractors, and labor providers using a structured risk framework that evaluates:
  - o Geographic location and country-specific human rights risk indices.
  - o Industry-specific risks (construction, electrical contracting, renewable energy sectors).
  - o Historical records of labor law violations, litigation, or sanctions.
- Vulnerability Analysis: Identify categories of workers who may be at heightened risk (e.g., migrant labor, temporary staff, subcontracted workers).

# 4.2 Screening and Onboarding

- Require suppliers and subcontractors to complete a Labor and Human Rights Self-Assessment Questionnaire prior to engagement.
- Integrate contractual clauses requiring compliance with labor and human rights standards, including prohibitions on forced labor, child labor, discrimination, harassment, and unsafe working conditions.
- Conduct background checks on high-risk suppliers through publicly available databases, certifications, or third-party verification platforms.

# 4.3 Ongoing Monitoring and Auditing

- Perform periodic site inspections and worker interviews (direct and through third parties) to validate compliance with labor and human rights requirements.
- Establish a supplier performance scorecard to measure adherence to Hi-Tech Electric's expectations on worker health, safety, and rights.
- Require annual certifications of compliance from suppliers and contractors, with supporting documentation when requested.

# 4.4 Grievance Mechanisms and Worker Voice

- Provide accessible and anonymous reporting channels (hotline, digital platform, or third-party service) for workers, subcontractors, and stakeholders to report violations without fear of retaliation.
- Ensure that grievances are documented, investigated promptly, and resolved transparently, with corrective actions communicated to relevant stakeholders.
- Encourage worker engagement through safety committees, feedback sessions, and periodic surveys.

#### 4.5 Corrective Action and Remediation

• Where violations are identified, require suppliers or subcontractors to implement time-bound corrective action plans.

- Terminate relationships with suppliers or contractors who fail to remedy severe violations or demonstrate a pattern of non-compliance.
- Provide or facilitate remediation to affected workers, including restitution of unpaid wages, improved working conditions, or support services.

# 5. Training and Awareness

- Mandatory training programs for employees and suppliers on labor rights, human trafficking risks, and ethical recruitment practices.
- Awareness campaigns on identifying and reporting violations.

#### 6. Compliance and Enforcement

- Senior management accountability for policy implementation.
- Integration of labor and human rights criteria into supplier selection and contracting.
- Regular policy review and updates to align with evolving best practices.

# 7. Quantitative Objectives

- Reduce reported workplace incidents by 10% annually.
- Conduct annual labor rights compliance assessments for all major suppliers.
- Increase employee training participation on labor rights topics by 15% each year.

## 8. Qualitative Objectives

- Foster a culture of continuous improvement in labor and human rights practices.
- Enhance collaboration with industry stakeholders to share best practices and drive systemic change.
- Strengthen supplier engagement programs to promote ethical labor standards throughout the supply chain.
- Encourage open communication and active participation from employees to create a transparent and supportive work environment.
- Align corporate policies with evolving international labor and human rights frameworks to ensure ongoing compliance and ethical business operations.

# 9. Communication and Transparency

- Public disclosure of labor and human rights performance in corporate sustainability reports.
- Ongoing stakeholder engagement, including customers, suppliers, and regulatory bodies.

## 11. Safeguards Against Modern Slavery

• Hi-Tech Electric Company has a zero-tolerance approach to modern slavery within our organization.

- Prevention, detection, and reporting of modern slavery is the responsibility of all individuals working for or on behalf of Hi-Tech Electric.
- Employees must not engage in, facilitate, or fail to report any activity that might suggest a breach of this policy.
- Hi-Tech Electric prohibits destroying, concealing, or confiscating employees' identity or immigration documents.
- E-Verify is utilized prior to hiring all employees to confirm legal working status.
- Compliance plan includes a reporting process for employees, including access to the Global Human Trafficking Hotline at 1-844-888-FREE and help@befree.org.

#### 12. Enforcement

- Risk-based approach to contracting processes, ensuring suppliers and subcontractors comply with Hi-Tech Electric's Code of Conduct.
- Employment agencies and third parties supplying workers must confirm compliance with our Code of Conduct.
- Hi-Tech Electric reserves the right to conduct audits of suppliers to ensure compliance.
- Non-compliance may result in disciplinary actions, contract termination, or other appropriate measures.

By adhering to this policy, Hi-Tech Electric Company reinforces its commitment to ethical labor practices, ensuring a fair and safe work environment for all stakeholders.

#### **Whistleblower Protection and Reporting Procedure**

Introduction - Hi-Tech Electric Company is committed to maintaining the highest standards of ethics, transparency, and compliance with applicable laws and regulations. As part of this commitment, we encourage our employees, contractors, suppliers, and other stakeholders to report any concerns or suspected violations of laws, regulations, or company policies. To ensure the protection of whistleblowers and the integrity of the reporting process, we have established the following Whistleblower Protection and Reporting Procedure.

- 1. Scope This procedure applies to all individuals associated with Hi-Tech Electric Company, including employees, contractors, suppliers, and other stakeholders. It covers concerns related to illegal activities, ethical misconduct, fraud, financial irregularities, health and safety violations, environmental concerns, or any other misconduct that may adversely affect the company's reputation or operations.
- 2. Reporting Channels Hi-Tech Electric Company provides multiple channels for reporting concerns or suspected violations:

# 2.1 Internal Reporting:

2.1.1 Direct Reporting: Whistleblowers can report their concerns directly to their immediate supervisor, manager, or any other member of the management team.

# 2.2 External Reporting:

- 2.2.1 Whistleblowers may choose to report their concerns directly to external regulatory bodies or appropriate government agencies if they believe internal channels are not suitable or effective.
- 3. Whistleblower Protection Hi-Tech Electric Company is committed to fully protecting the confidentiality and anonymity of whistleblowers permitted by law. The following measures are implemented to ensure whistleblower protection:
  - 3.1 Confidentiality: All reports and related information will be treated with strict confidentiality, to the extent permitted by law and the need to investigate and address the reported concerns.
  - 3.2 Non-Retaliation: Hi-Tech Electric Company strictly prohibits retaliation against whistleblowers. Any form of retaliation, such as harassment, demotion, termination, or discrimination, against a whistleblower is a violation of company policy and may result in disciplinary action.
  - 3.3 Anonymous Reporting: Whistleblowers have the option to submit their reports anonymously, either through external regulatory bodies or other designated reporting channels. Hi-Tech Electric Company will not attempt to trace the identity of anonymous whistleblowers unless required by law or deemed necessary for the investigation.

- 4. Reporting Procedure When reporting a concern or suspected violation, whistleblowers should follow these steps:
  - 4.1 Document the Concern: Prepare a written summary of the concern, providing as much detail as possible, including dates, times, locations, individuals involved, supporting documents (if available), and any other relevant information.
  - 4.2 Choose Reporting Channel: Select the most appropriate reporting channel, either internal or external, based on the nature of the concern and the whistleblower's comfort level.
  - 4.3 Submit the Report: Submit the concern or suspected violation through the chosen reporting channel. If using the internal reporting channels, provide the report to the immediate supervisor, manager, or any member of the management team. If using the ethics hotline, follow the instructions provided for anonymous or non-anonymous reporting.
  - 4.4 Follow-up: Whistleblowers may be contacted for additional information or clarification during the investigation process. However, if the whistleblower has chosen to remain anonymous, they should not disclose their identity during these communications.
- 5. Investigation and Resolution All reports received will be promptly and thoroughly investigated by the appropriate departments within Hi-Tech Electric Company. Investigations will be conducted with sensitivity, fairness, and impartiality. Once the investigation is completed, appropriate actions will be taken to address the concern and, if necessary, to prevent future violations.
- 6. Reporting Follow-up Hi-Tech Electric Company will make reasonable efforts to provide feedback to whistleblowers who have identified themselves or chosen to be contacted during the investigation process. However, due to the nature of anonymous reporting, it may not always be possible to provide specific feedback.
- 7. Retention of Records All reports, investigations, and related documents will be retained in accordance with applicable laws and company policies. Records will be securely stored and protected to maintain confidentiality.
- 8. Non-Disclosure Agreement Hi-Tech Electric Company acknowledges that whistleblowers may be bound by confidentiality agreements or non-disclosure obligations. To the extent permitted by law, the company will not take any action to enforce such agreements against whistleblowers who report concerns or suspected violations in good faith.
- 9. Communication and Awareness Hi-Tech Electric Company will communicate and provide regular training on this Whistleblower Protection and Reporting Procedure to all employees, contractors, suppliers, and other stakeholders. The company will strive to

foster a culture of transparency and encourage the reporting of concerns without fear of retaliation.

# APPENDIX A – POLICY UPDATE

Employees who report violations under the Indiana Whistleblower Protection Act will not be subject to retaliation.

Reports can be made confidentially, and employees may seek protection under Indiana labor law.

#### **Collective Bargaining Agreements**

Hi-Tech Electric is a signatory contractor under a Collective Bargaining Agreement (CBA) with the International Brotherhood of Electrical Workers (IBEW) and the National Electrical Contractors Association (NECA). Employees covered by the CBA are subject to the terms and conditions outlined in that agreement.

This Employee Handbook applies to employees who are not covered by the CBA and addresses topics not governed by the agreement. In the event of any conflict between this handbook and the CBA, the terms of the CBA shall take precedence for covered employees.

# Qualitative objective:

- Aim to build constructive relationships with employees and trade representatives.
- Strengthen proactive engagement with employee and union representatives by formalizing biannual labor-management roundtables focused on workforce well-being, project safety, and training opportunities. Emphasize early collaboration to resolve concerns before escalation and build mutual trust.

# **Quantitative targets:**

- Maintain the number of employees covered by a collective bargaining agreement in 2030.
- Achieve 95% participation in scheduled joint labor-management meetings and safety committees by 2030, ensuring consistent dialogue, timely issue resolution, and shared accountability between leadership and trade partners.

#### FW CBA

Freedom of Association and Collective Bargaining

- Respect for employees' rights to form or join trade unions and engage in collective bargaining.
- No discrimination or retaliation against employees exercising these rights.
- Establish mechanisms for constructive dialogue and negotiation with employee representatives or unions.
- Establish mechanisms for constructive dialogue and negotiation with employee representatives or unions.
- Ensure that company policies and practices do not discriminate against employees based on their union membership or participation in trade union activities.
- Provide training and support for employees, supervisors, and managers on the rights and benefits of freedom of association and collective bargaining.

#### HOURS - WAGE PAYMENT - WORKING CONDITIONS

Section 4.01: (a) Eight (8) consecutive hours worked between the hours of 6:00 a.m. and 4:30 p.m. with no less than thirty (30) minutes nor more than one (1) hour intermission for lunch and one (1) paid twenty (20) minute break in the morning and fifteen (15) minute break after eight (8) hours and every two (2) hours thereafter. Employees shall not use these breaks as early leave. Forty (40) hours within five (5) days, Monday through Friday inclusive, shall constitute a regular work week for which the wage rates scheduled in Section 4.04 (a) and (b) shall be paid. However, when a holiday designated in Section 4.02(a) intervenes, that week shall consist of four (4) days. The Employer shall give a minimum of one calendar day notice of work schedule changes except in the case of emergency.

- (b) The Employer, with the consent of the Business Manager, may institute a work week consisting of four (4) consecutive ten (10) hour days between the hours of 6:00 a.m. and 6:00 p.m., Monday through Thursday, with one-half hour or one hour allowed for a lunch period and one (1) paid twenty (20) minute break in the morning and fifteen (15) minute break after eight (8) hours and every two (2) hours thereafter. Employees shall not use these breaks as early leave. With prior notification to the Business Manager, the Employer may institute a standard work week consisting of four (4) consecutive ten (10) hour days but is limited to a maximum of two consecutive (2) forty (40) hour weeks. Shall only be instituted in weeks in which a holiday falls Monday through Friday. Any member who does not wish to work the 10-hour schedule will not be punished for working the 8-hour schedule. Friday and /or Saturday may be used as a make-up day (except on the week following Labor Day), and if utilized, a minimum of four (4) hours must be scheduled. After ten (10) hours worked on any day during a four (4) day, ten (10) hour work week (including a make-up day, if scheduled), overtime shall be paid at one and one half (1/2) times the straight time rate of pay. After forty (40) hours in a work week, the appropriate overtime rate shall be paid. It is also understood that no employee shall be disciplined or discriminated against for his/her inability or refusal to work a make-up day.
- (c) The Employer, with consent of the Business Manager, may institute a second shift of four (4) ten- (10) hour work days, Monday through Thursday which can be worked alone or in tandem with a first shift. In the event of inclement weather, or if a holiday, as set forth in Section 4.02(b), or a day celebrated as such, falls Monday through Thursday, then the Employer may opt to substitute Friday at the appropriate rate of pay (except for the Friday following Labor Day). After ten (10) hours in a workday, or forty (40) hours in a workweek, overtime shall be paid at a rate of one and one half (1-1/2) times the appropriate rate of pay. The rate of pay on a second shift of four (4) ten (10) hour days shall be the second shift rate (as specified in section 5.01) for all hours worked between 4:30 p.m. and 1:00 a.m. and the third shift rate for all hours worked after 1:00 a.m. No Employee shall be disciplined for being unable or unwilling to work on a substituted Friday.
- (d) Employees shall be entitled to one (1) break of no more than ten (10) minutes for every two (2) hours worked after ten (10) hours worked in a day.
- Section 4.02: (a) All work performed outside of the regularly scheduled working hours Monday through Friday and all hours worked on Saturday, shall be paid for at one-and-one half times the straight time rate of pay.
- (b) All work performed on Sunday, New Years Day, Memorial Day, Fourth of July, Labor Day, Thanksgiving Day, day after Thanksgiving, and Christmas Day, shall be paid for at double the straight time rate of pay.

If a holiday falls on Sunday, the following Monday shall be observed, and any work performed on that Monday will be paid at one-and-one half times the straight time rate of pay. If a holiday falls on Saturday, the preceding Friday shall be observed, and any work performed on that Friday will be paid at one-and-one half times the straight time rate of pay.

Section 4.03: No work shall be performed on Labor Day except in case of emergency to protect life and/or property.

Section 4.04: (a) The minimum hourly rate of wages shall be as follows:

Journeyman Wireman Effective:

12/01/23	12/01/24	12/01/25
\$38.31 base	+\$2.69 total	+\$2.81 total
wage / \$59.77	package*	package*
total nackage		

<sup>\*</sup>Total Package - includes increases to the Journeyman Wireman wage rate, health & welfare, and all pension contributions.

Foreman 112% of Journeyman Wireman rate General Foreman 118% of Journeyman Wireman rate

(b) For apprentices indentured prior to December 1, 2020, the scheduled rates of pay shall be the following percentage of journeyman wireman rate.

1st Period	40% of Journeyman Wireman rate
2 <sup>nd</sup> Period	45% of Journeyman Wireman rate
3rd Period	50% of Journeyman Wireman rate
4th Period	60% of Journeyman Wireman rate
5th Period	70% of Journeyman Wireman rate
6th Period	80% of Journeyman Wireman rate

For apprentices indentured on or after December 1, 2020, the scheduled rates of pay shall be the following percentage of journeyman wireman rate.

1st Period	45% of Journeyman Wireman rate
2 <sup>nd</sup> Period	50% of Journeyman Wireman rate
3rd Period	55% of Journeyman Wireman rate
4th Period	65% of Journeyman Wireman rate
5th Period	70% of Journeyman Wireman rate
6th Period	80% of Journeyman Wireman rate

Section 4.05: On all energized circuits or equipment carrying 440 volts or over, as a safety measure, two journeyman must work together, or one journeyman and one fifth year apprentice.

Section 4.06: Whenever any work is being done on live conductors from extension ladders or staging over twenty (20) feet high, or in a congested area, not less than two (2) workmen shall work together.

Section 4.07: Not less than two (2) workmen shall be employed where a boatswain chair (swing seat) or swing scaffold is being used. Where work is twenty (20) feet from the ground and the ladder rests on a slippery base, or where the work is performed in a congested traffic area, one journeyman or apprentice shall steady and protect the ladder.

Section 4.08: The wage rate for employees working forty (40) feet above the floor grade line, or impact area shall be one and one-quarter (1 1/4) times the straight time rate of pay with the following exclusions: Work in bucket trucks, work on motorized scaffolds, work on completed permanent structural catwalks, and work on completed permanent swing bridges. These exclusions do not apply to towers and poles.

Section 4.09: Wages shall be paid weekly in cash, direct deposit, or by payroll check from a credit union or bank having a branch office within the local union's jurisdiction. If an employee agrees to be paid by direct deposit, he/she also agrees that he will accept his final paycheck as a direct deposit initiated on the same business day as his/her termination. Not more than seven (7) days wages may be withheld at any time, and payment is due no later than noon on Friday of the following week. In the event an employee is not paid, waiting time at fifteen percent (15%) of wages due shall be assessed daily until payment is made. On jobs employing five (5) or more employees, the Employer shall make provisions to pay off at the job site.

Any employee laid off shall be paid his or her wages immediately, unless they have elected to be paid by direct deposit as mentioned in the previous paragraph, and if not so paid, the provisions of this Section shall apply. In the event that an Employer prepares a final check in anticipation of a layoff, and said check requires an adjustment due to an employee's action (e.g., absence, tardiness), then the Employer shall be given three (3) days, weekends and holidays excluded, to reissue the check. The reissued check may, at the Employer's option, be held at the Employer's office to be picked up by the payee, be mailed to the payee at his or her last known address (postmarked not later than the third day), or be delivered to the Local Union office.

Section 4.10: When members are directed to report to a job and do not start work due to lack of material or other causes beyond their control, they shall receive two (2) hours pay.

Section 4.11: On all jobs requiring five (5) or more journeymen, at least every fifth (5th) journeyman, if available, shall be fifty (50) years of age or older.

Section 4.12: (a) Any Journeyman having four (4) or more employees under his supervision shall be designated a Foreman by the Employer. The first Foreman shall supervise no more than twelve (12) men, including apprentices. The second foreman shall supervise no more than eleven (11) men, including apprentices and each foreman thereafter shall supervise no more than ten (10) men. On any job having four (4) Foremen, the Employer shall appoint a General Foreman. No General Foreman shall supervise more than five (5) Foremen. General Foremen shall supervise only Foremen. Any project requiring three hundred man hours or fewer in a work week, not to exceed two consecutive weeks, does not require a foreman.

- (b) Foremen and General Foreman shall be appointed by the Employer. Foremen will work with the tools or refrain from working with them at the direction of the Employer. General Foreman shall not work with the tools.
- (c) The workforce on overtime work shall be made up of assigned employees from the job, unless special skills or abilities are needed. Foremen shall not be discriminated against in the distribution of overtime equally among employees. Conditions may warrant Foremen on the job and workmen and Foremen from other jobs to make up the workforce needed on an overtime job.
- (d) The Employer, with input from the Steward, shall endeavor to distribute the overtime equally among the employees as far as practicable.

Section 4.13: The employer shall have the right to call a Foreman by name provided:

- (a) The Employee has not quit his previous employer within the past two weeks.
- (b) The employer shall notify the business manager in writing of the name of the individual who is being requested for employment as a Foreman. Upon such request, the Business Manager shall refer said individual provided the name appears on the highest priority group.
- (c) When an employee is called as a Foreman, he must remain in that capacity for 1,000 hours or until Group I is exhausted (which also occurs when a Group II journeymen is referred), and if not, he must receive a reduction in force. This individual must be paid at least Foreman's rate until 1,000 hours are worked or Group 1 is exhausted.

A Foreman is defined as an individual in charge of a specific job or is an individual having four (4) or more employees under his supervision. The job he is being called for must be specified in the written notice.

If an individual called as a Foreman is transferred to another job prior to working 1,000 hours, or before Group I is exhausted, the Business Manager must be notified in writing. The individual must continue to serve in the capacity of a Foreman as defined above.

Section 4.14: On jobs having a Foreman, workmen are not to take directions or orders, or accept the layout of any job from anyone except his Foreman.

Section 4.15: The Foreman on the job shall notify the job steward or Business Manager of the Local Union in advance of any layoff or reduction in force. Section 4.16: Journeymen shall provide themselves with the following tools:

Two (2) Channel Lock Pliers Knife Six-Foot Wooden Rule Pencil

Hammer Hacksaw Frame
Screwdrivers - Not over 8" Plumbob
Pliers - Cutting Level - Small
Needle Nose Pliers Diagonals
Small 600 Volt Tester - Wiggins Type Wire Strippers

Adjustable Wrench - Crescent Type - Not to exceed 8"

In addition, employees shall be permitted, but not required to provide themselves with the following tools:

Steel Measuring Tape Spin-tites

Anti-Dog Open or Box ended wrenches (up to 9/16")
Small allen wrench or key set Digital Meter - Fluke type or equivalent

All Employee supplied tools shall either meet or exceed OSHA or IOSHA Standards and be made in the USA.

Section 4.17: The Employer shall furnish all other necessary tools or equipment. Workmen will be held responsible for replacing or repairing the tools or equipment issued to them provided that the Employer furnishes the necessary lockers, tool boxes or other safe places of storage and that the tool or equipment was not damaged or made unusable as a result of normal usage.

On all jobs the Employer shall furnish suitable lockers or chests for storage of workmen's clothing and tools, with padlocks or other suitable security fasteners.

Employees will be required to use all protective equipment supplied by the Employer.

Section 4.18: The Employer shall pay for traveling time or furnish transportation from shop to job, job to job, and job to shop within the jurisdiction of the Union. As an alternative to furnishing such transportation, upon request by the Employer and agreement by the employee, the Employer shall pay for such transportation in the employee's vehicle at the maximum rate allowable by the IRS.

On work outside the jurisdiction of the Union, the Employer shall furnish transportation, board and all necessary expenses.

This Section shall not be interpreted to include mileage to be paid to an applicant when employed and instructed by the Employer to report to a job.

- Section 4.19: No workmen, in order to be employed under the terms of this Agreement, shall be required to undergo any physical examination for any insurance under the Workers Compensation Law (generally known as the Hammond Bill).
- Section 4.20: All conduit shall be cut and threaded by workmen employed under this Agreement.
- Section 4.21: Where pipe cutting and threading machines are used, such shall be operated by employees covered by this Agreement. There shall be no limitations as to the amount of work a workman shall perform during the work day, nor shall there be any restriction as to the use of machinery simplifying work.
- Section 4.22: An employee shall have the right to refuse to use any tool which requires an explosive to operate and shall not be terminated or discriminated against for this reason. Only employees who have had experience and/or training in the operation of the particular tool in use shall be allowed to operate a powder actuated tool.
- Section 4.23: No employee shall be required to use his vehicle for transportation of the Employer's tools or materials. Employees may transport Employer-issued personal protective equipment in their vehicles. Employees may transport Employer-issued tools and minor materials confined to a normal tool box (25"x12"x12" inside dimension) not exceeding fifty (50) pounds and/or one piece of electronic test equipment.
- Section 4.24: During the periods when unemployment of journeymen normally employed in the area exceeds fifty percent (50%), the Business Manager of the Union, by agreement with the Employer, shall rotate the journeymen working so that those in need may work part-time until all are employed.

Section 4.25: Any workmen required to go to the Employer's shop or to the supply store for material or other purposes, shall report at the place designated at the specified starting time of the regular work day, the same as going directly to the job, and if workmen are required to report at the shop at the specified quitting time of the regular work day, they shall report on the Employer's time.

Section 4.26: Vacation periods shall be worked out as nearly as possible to the satisfaction of the Employer and employee. Not more than ten percent (10%) of the employees in any shop or on any job shall be granted vacation periods at the same time unless agreed upon by the Employer and employees, except employees of Employers where this percentage would not apply.

Section 4.27: If requested, Employers shall provide hand disinfectant and hand wipes on any job worked within the jurisdiction.

Section 4.28: If requested, Employers shall provide bottled water.

#### **Intellectual Property and Confidentiality Policy**

Introduction: Hi-Tech Electric Company recognizes the importance of protecting its
intellectual property and confidential information. This Intellectual Property and
Confidentiality Policy establishes guidelines and expectations for employees, contractors,
consultants, and any other individuals granted access to company information. The
purpose of this Policy is to safeguard proprietary information, trade secrets, and
intellectual property rights, and to ensure compliance with applicable laws and
regulations.

#### 2. Definitions

- 2.1 Intellectual Property (IP): Intellectual Property refers to any creations of the mind, including inventions, designs, processes, trademarks, trade secrets, copyrights, and any other proprietary information that has commercial value.
- 2.2 Confidential Information: Confidential Information includes any non-public information, whether written, oral, electronic, or in any other form, that is disclosed by Hi-Tech Electric Company and is not generally available to the public.

# 3. Obligations

- 3.1 Protection of Intellectual Property: All employees and individuals associated with Hi-Tech Electric Company must respect and protect the company's intellectual property. This includes not infringing on third-party intellectual property rights and using company intellectual property only for authorized purposes.
- 3.2 Confidentiality Obligations: All employees and individuals associated with Hi-Tech Electric Company must maintain the confidentiality of all confidential information disclosed to them during their association with the company. Confidential information should not be disclosed, shared, or used for personal gain, both during and after their association with the company, except as expressly authorized.

## 4. Handling of Intellectual Property and Confidential Information

- 4.1 Access Control: Access to intellectual property and confidential information should be restricted to individuals who require it to perform their job responsibilities. Access must be granted based on a need-to-know basis and should be promptly revoked when no longer required.
- 4.2 Marking and Labeling: Intellectual property and confidential information must be clearly marked or labeled as such. This helps identify and differentiate it from other non-confidential information.

- 4.3 Physical Security: Physical measures must be implemented to protect physical copies of intellectual property and confidential information, such as locked filing cabinets, secure storage areas, and visitor control procedures.
- 4.4 Digital Security: Appropriate technological measures, including passwords, encryption, firewalls, and access controls, must be employed to safeguard digital copies of intellectual property and confidential information from unauthorized access, disclosure, or alteration.

# 5. Reporting Obligations

- 5.1 Suspected Misuse or Unauthorized Disclosure: Employees and individuals associated with Hi-Tech Electric Company must promptly report any suspected misuse, unauthorized disclosure, or loss of intellectual property or confidential information to their immediate supervisor or the designated authority within the company.
- 5.2 Whistleblower Protections: Hi-Tech Electric Company maintains a whistleblower policy that protects employees who report violations of this Policy or any other unlawful activity. Retaliation against whistleblowers is strictly prohibited.

#### 6. Compliance and Consequences

- 6.1 Policy Compliance: Failure to comply with this Policy may result in disciplinary action, up to and including termination of employment or termination of any association with Hi-Tech Electric Company. Violations of this Policy may also lead to legal action and the imposition of civil and criminal liabilities.
- 6.2 Continuing Obligations: The obligations of confidentiality and protection of intellectual property outlined in this Policy continue even after the termination of employment or association with Hi-Tech Electric Company.

# 7. Training and Awareness

7.2 Training Programs: Hi-Tech Electric Company will conduct regular training programs to educate employees and individuals associated with the company about the importance of intellectual property and confidentiality, as well as their obligations and responsibilities under this Policy.

## 8. Policy Review

8.1 Regular Review: This Policy will be reviewed periodically to ensure its ongoing relevance and effectiveness. Updates and revisions will be made as necessary to address changes in technology, laws, regulations, and business needs.

By following this Intellectual Property and Confidentiality Policy, we can collectively protect Hi-Tech Electric Company's intellectual property and confidential information, maintaining our competitive advantage and fostering trust among our employees, partners, and stakeholders.

# **Employee Privacy and Data Protection Policy**

At Hi-Tech Electric Company, we value the privacy and confidentiality of our employees' personal information and are committed to protecting their data. This Employee Privacy and Data Protection Policy outlines our guidelines and procedures for handling employee data, both during their employment and after termination. It applies to all employees, contractors, and third parties who have access to employee data.

#### 1. Collection and Use of Employee Data

- 1.1 We collect and maintain only relevant personal data necessary for legitimate employment-related purposes, such as recruitment, onboarding, payroll, benefits administration, performance evaluation, and compliance with legal obligations.
- 1.2 Personal data may include, but is not limited to, employee contact information, employment history, compensation details, benefits information, tax data, and emergency contact details.
- 1.3 Employee data will be collected and processed lawfully, fairly, and transparently, and with the knowledge and consent of the individual, except when required by applicable law or necessary for the performance of an employment contract.

#### 2. Confidentiality and Security

- 2.1 Hi-Tech Electric Company will implement appropriate technical and organizational measures to protect employee data from unauthorized access, disclosure, alteration, or destruction.
- 2.2 Access to employee data will be restricted to authorized personnel on a need-to-know basis for legitimate business purposes.
- 2.3 Confidentiality agreements and data protection training will be provided to employees with access to personal data to ensure they understand their responsibilities and obligations.

#### 3. Data Retention

- 3.1 Employee data will be retained only for as long as necessary to fulfill the purposes for which it was collected, as required by law or company policies.
- 3.2 Upon termination of employment, employee data will be retained in accordance with legal requirements and our data retention policies.
- 3.3 Employees have the right to request the deletion or correction of their personal data, subject to applicable laws and legitimate business interests.

# 4. Sharing of Employee Data

- 4.1 Hi-Tech Electric Company may share employee data with third parties for legitimate business purposes, such as benefits administration, payroll processing, legal compliance, and IT support. These third parties will be required to maintain the confidentiality and security of the data.
- 4.2 Employee data will not be shared with external parties for marketing purposes without explicit consent, except as required by law or regulations.

# 5. Employee Rights and Responsibilities

- 5.1 Employees have the right to access their personal data and request their correction, deletion, or restriction of processing, subject to legal requirements and company policies.
- 5.2 Employees should promptly report any unauthorized access, loss, or disclosure of personal data to the appropriate authorities and the Chief Compliance Officer.
- 5.3 Employees should adhere to company policies and procedures regarding the protection of personal data and respect the privacy rights of their colleagues.

# 6. Compliance with Laws and Regulations

- 6.1 Hi-Tech Electric Company will comply with applicable data protection laws and regulations, including but not limited to the General Data Protection Regulation (GDPR) and local data protection laws.
- 6.2 We will regularly review and update our data protection practices to ensure compliance with evolving legal requirements and industry standards.

# 7. Chief Compliance Officer

- 7.1 Hi-Tech Electric Company has appointed the IT manager responsible for overseeing the implementation and enforcement of this policy and ensuring compliance with data protection laws.
- 7.2 Employees can contact the IT manager for any questions, concerns, or requests regarding their personal data.

By acknowledging and accepting this policy, employees agree to abide by its provisions and understand that non-compliance may result in disciplinary action, up to and including termination of employment.

Please note that this policy is subject to periodic review and may be updated or revised to reflect changes in applicable laws, regulations, or company practices. Employees will be notified of any significant updates to this policy

# **Online Behavior Policy**

1. Introduction: Hi-Tech Electric Company recognizes the importance of social media and online platforms as tools for communication and networking. This policy outlines the guidelines and expectations for employees' behavior and the use of social media and online platforms while representing the company. It applies to all employees, contractors, and representatives of Hi-Tech Electric Company.

#### 2. Professional Conduct

- 2.1. Representing the Company: When engaging in social media activities, employees should clearly state that their views are personal and not representative of Hi-Tech Electric Company unless they have been authorized to speak on behalf of the company.
- 2.2. Professionalism: Employees should maintain a professional and respectful tone in all online interactions related to the company. Offensive, discriminatory, harassing, or defamatory content is strictly prohibited.
- 2.3. Confidentiality: Employees must not disclose any confidential or proprietary information about the company, its clients, or its partners. Confidential information includes financial details, customer data, intellectual property, trade secrets, and any other sensitive information.

#### 3. Personal Social Media Accounts

- 3.1. Personal Responsibility: Employees are personally responsible for the content they publish on their personal social media accounts. However, they should be aware that their actions can reflect on the company's reputation.
- 3.2. Disclaimers: If an employee's social media profile identifies them as an employee of Hi-Tech Electric Company, they should include a disclaimer stating that their views are personal.
- 3.3. Respect for Colleagues: Employees should refrain from posting content that could harm the reputation or privacy of their colleagues. Criticism or negative comments about the company or fellow employees should be addressed through appropriate channels within the organization.

#### 4. Official Company Accounts

- 4.1. Authorization: Only designated individuals approved by Hi-Tech Electric Company may manage and post on official company social media accounts.
- 4.2. Consistency and Accuracy: Employees handling official accounts should ensure that information shared is accurate, up-to-date, and aligns with the company's values and guidelines.

- 4.3. Responding to Inquiries: Employees handling official accounts should promptly respond to inquiries and engage in a professional and courteous manner. If unable to answer a question, they should direct the individual to the appropriate channels within the company.
- 5. Consequences of Violations: Any violations of this policy may result in disciplinary action, including but not limited to verbal or written warnings, suspension, termination, or legal action if applicable.
- 6. Training and Awareness: Hi-Tech Electric Company will provide training and resources to employees to promote understanding and compliance with this policy. Employees are encouraged to stay updated on changes in social media platforms and evolving best practices.
- 7. Policy Review: This policy will be reviewed periodically to ensure its relevance and effectiveness. Any updates or revisions will be communicated to all employees.

By adhering to this policy, employees contribute to the positive representation of Hi-Tech Electric Company in the online community and help maintain its reputation and integrity.

#### DRIVER POLICY STATEMENT

As an operator of a company vehicle:

I have received and reviewed the Employee Handbook and agree to comply with the specific conditions outlined in the Handbook for Vehicle Safety under "Statement of Policy" and "Specific Safety Rules and Issues."

I understand that only employees are permitted to operate company vehicles.

I understand that no personal use of the company vehicle is permitted unless authorized by my supervisor.

I understand that it is my responsibility to operate the company vehicle according to all applicable traffic laws and regulations.

I understand that I am to utilize all restraint systems provided for my safety while operating a company vehicle.

I authorize the Company to review my Motor Vehicle Record at any time to evaluate my driving record for the purpose of monitoring my driving behavior and compliance with traffic laws and regulations.

I understand that it is my responsibility to report any and all vehicle maintenance problems to management and I am not to operate any vehicle determined to be in unsafe condition.

I understand that smoking is not allowed in the company vehicle.

I understand that driving the company vehicle under the influence of alcohol or narcotics is not permitted.

I understand that carrying concealed weapons in the company vehicle is not permitted and concealed weapons may not be stored in the company vehicle.

I will immediately report any accident involving the company vehicle to my Supervisor and cooperate in any investigation to determine preventability to promote driver improvement awareness.

I understand that my refusal to comply with any part of this agreement may result in my driving privileges being rescinded and actions regarding my employment status may be taken per established Company disciplinary policies.

Signature of Driver	Date
Signature of Supervisor	Date
Copies placed in Driver's File and provided to Em	ployee.

#### HI-TECH ELECTRIC DISTRACTED DRIVING POLICY

**Policy Summary Statement** 

This section provides a high-level overview of the policy. For complete details, including specific procedures, requirements, and guidelines, please refer to the Safety Manual. In the event of any discrepancies, the Safety Manual shall take precedence.

Please read the Distracted Driving Policy, sign and return to your supervisor.

In order to increase employee safety and eliminate unnecessary risks behind the wheel, Hi-Tech Electric has enacted a Distracted Driving Policy, effective 07/31/12. We are committed to end ing the epidemic of distracted driving, and have created the following rules, which apply to any employee operating a company vehicle or using a company-issued cell phone while operating a personal vehicle

- Company employees may not use a hand-held cell phone while operating a vehicle—whether the vehicle is in motion or stopped at a traffic light. This includes, but is not limited to, answering or making phone calls, engaging in phone conversations, and reading or responding to emails, instant messages, and text messages.
- If company employees need to use their phones, they must pull over safely to the side of the road or another safe location.
- Additionally, company employees are required to:
  - o Turn cell phones off or put them on silent or vibrate before starting the car
  - Consider modifying voice mail greetings to indicate that you are unavailable to answer calls or return messages while driving
  - o Inform clients, associates and business partners of this policy as an explanation of why calls may not be returned immediately.
  - o 1<sup>st</sup> offense is a written warning. 2'd offense is 2 weeks of unpaid leave 3'd offense is grounds for termination of employment.

I acknowledge that I have received a written copy of the Distracted Driving Policy, that I fully understand the terms of this policy, that I agree to ab ide by these term s, and that I am willing to accept the consequences of failing to follow the policy.

#### SMOKING POLICY

#### Statement

Hi-Tech Electric Company, Inc. hereby adopts the following Company Smoking Policy to comply with the Calhoun County Clean Indoor Air Regulation which eliminates smoking in public and private worksites and public places.

## **Policy**

Effective January 1, 2008 smoking is prohibited in all enclosed areas within an employee's worksite without exception. This includes common work areas, auditoriums, classrooms, conference and meeting rooms, private offices, elevators, hallways, medical facilities, cafeterias, employee lounges, stairs, restrooms; employer owned or leased business vehicles, and all other enclosed facilities.

### **Definitions**

The following words and phrases shall be construed as defined below, whenever used in this policy.

"Employee" means any person who is employed in the consideration for direct or indirect monetary wages or profit, and any person who volunteers his or her services.

"Employer" means Hi-Tech Electric Company, Inc.

"Enclosed area" means all space between a floor and ceiling which is enclosed on all sides by solid walls or windows (exclusive of door or passage ways) which extend from the floor to the ceiling, including all space therein screened by partitions which do not extend to the ceiling or are not solid, office landscaping, or similar structures.

"Worksite" means any enclosed area under the control of a public or private employer which employees normally frequent during the course of employment, including, but not limited to, work areas, employee lounges and restrooms, conference and class rooms, employee cafeterias, and hallways.

"B<sub>j</sub>:siness vehicle" means a car, truck, van, or other motorized unit which is owned or leased by an employer for the use of employees.

"Smoking" means inhaling, exhaling, burning or carrying any lighted cigar, cigarette, pipe, weed, plant, or related substance or product.

#### CRIMINAL BACKGROUND CHECK POLICY

Before being sent to one of our industrial facilities, Employees must take a criminal background check. This is done through a third party (OneSource). In addition to this third party check, there are three debarment websites that we check.

They are https://www.epls.qov/epls; http://www.fda.qov/ora/complianceref/debar, and http://exclusions.oiq.hhs.qov/.

If any of our employees leave these sites for a longer duration than 90 days then these checks all have to be re-run on said employee before returning back to the site.

# Disqualifying Offenses

### Felonies

- All felony convictions within the last seven (7) years except as restricted by applicable federal, state and local laws.
- All felony drug convictions (no time limit) where the individuals position would include the handling of pharmaceuticals in any capacity.

#### Misdemeanors

The following misdemeanor convictions within a period d five (5) years except as restricted by applicable federal, state and local law:

- Arson
- Assault
- Battery
- Child Abuse and neglect
- Criminal contempt
- Criminal conversion (Theft)
- Criminal mischief
- Escape
- Evading Arrest
- Failure to stop
- Harassment
- Hit and Run collision
- Indecent Exposure
- Injury to personal Property
- Larceny

- Petty theft/Possession of controlled substances
- Possession of drug paraphernalia
- Possession of marijuana
- Possession of stolen goods
- Prostitution
- Purchasing alcoholic beverages for a minor
- Resisting arrest
- Sexual offenses
- Theft by check
- Trespassing
- Unlawful sales to minors (alcohol and tobacco)
- Vandalism
- Violation of probation
- Violation of protection order
- Welfare violation

## **Pending Charges**

An individual charged with a disqualifying offense may not be placed on an industrial site while any such charge is pending. The individual may be considered for placement if exonerated of the charge.

## **Outstanding Warrants**

Individuals charged with a disqualifying offense may not be placed on an industrial site, until the warrant has been dismissed.

## Failure to disclose

Any individual who fails to disclose any felony and/or misdemeanor conviction prior to the Agency's submission of the individual's background information for the criminal record check may not be placed on an industrial site.

### Non-Disqualifying Offenses

A conviction of one of the following offenses within a five (5) year period (as long as the offenses did not occur within the previous twelve (12) months), and there are no other convictions of any other disqualifying offense:

Breach of Peace Disorderly Conduct Failure to Appear

# Motor Vehicle Record (MVR

The following MVR check is required prior to the placement of any individual in a position that requires the operation of a motor vehicle on behalf of Hi-Tech Electric Company:

Disqualifying Criteria

Invalid, suspended, or revoked driver's license

- (1) Conviction or driving under the influence (DUI) within the preceding year, (2) or more DUI convictions, no time limit
- (3) Or more moving violations within the last 3 years

Any accumulation of suspensions of over (1) year in length within the last 3 years More than 2 accidents with indication of fault within the last 3 years

More than 3 accidents with indication of fault, no time limit

#### RETURN TO WORK PROGRAM

Return to Work and Light Duty Policy

## Purpose

Hi-Tech Electric Company is committed to providing a safe and supportive work environment. The purpose of this Return to Work (RTW) and Light Duty Policy is to establish procedures that assist employees recovering from work-related injuries or illnesses in resuming work as soon as medically appropriate, in a capacity that aligns with their medical restrictions.

# Scope

This policy applies to all employees of Hi-Tech Electric Company who have sustained a work-related injury or illness and are eligible to return to work under modified or alternate conditions.

# Objectives

- Promote a timely, safe return to work for injured or ill employees.
- Minimize disruption to employee productivity and company operations.
- Reduce the overall costs associated with workplace injuries.
- Retain experienced and valuable employees.
- Support compliance with applicable Workers' Compensation laws.

### **Definitions**

- Modified Duty: The employee's regular position with medically approved adjustments to tasks, hours, or responsibilities.
- Alternate Duty: A different temporary position within the company that complies with the employee's medical restrictions.
- Transitional Work Assignment: Short-term tasks assigned during recovery.
- Attending Physician (AP): The medical provider authorized to direct care and establish work restrictions.
- Modified Duty Letter: A formal offer describing the modified duties available.
- Medical Restrictions: Limitations prescribed by the attending physician to ensure safe return to work.
- Modified Duty Release: A medical release form confirming the employee can return to work under specific restrictions.

## 5. Responsibilities

### Management

- Promote understanding and compliance with the RTW program.
- Identify appropriate modified or alternate duties.
- Maintain communication with HR, the Safety Director, and the physician regarding the employee's condition.

## Supervisors

- Monitor daily compliance with assigned restrictions.
- Issue Modified Duty Letters and coordinate transitional work.
- Keep accurate records of attendance and duties performed.

#### **Human Resources**

- Maintain documentation of all RTW activity.
- Track availability of modified duty assignments.
- Approve modified duty assignments longer than 90 days.

# Safety Director

- Provide training and consultation related to this policy.
- Meet with employees to explain their assigned duties.
- Monitor trends and generate annual reports.

### **Employees**

- Report injuries immediately to their supervisor.
- Submit medical documentation to the appropriate personnel.
- Comply with restrictions and attend follow-up appointments.
- Obtain formal clearance from the physician before resuming normal duties.

#### **Procedures**

#### Reporting and Treatment

- Employees must report all work-related injuries or illnesses immediately.
- Medical treatment must be coordinated through the company's Workers' Compensation insurance adjuster and management.

#### Return-to-Work Process

• No employee may return without a formal release from the attending physician.

- Upon release, a Modified Duty Letter will be issued. Employees must accept or decline the assignment.
- A return-to-work meeting will be scheduled with management and the Safety Director to confirm duties and expectations.

## Monitoring and Duration

- Supervisors will monitor compliance and maintain a daily log.
- Restrictions may be adjusted based on updated medical evaluations.
- Assignments will remain temporary unless a permanent job modification is required and feasible.

# 7. Modified Duty Examples

Examples of modified or alternate duties may include:

- Office tasks
- Shop cleaning
- Reduced hours
- Task assistance
- Restricted lifting, climbing, or equipment operation
- Limited standing, sitting, or walking duration

# 8. Recordkeeping

All documentation will be securely stored in employee personnel files at the corporate office. Records include:

- Physician's work status forms
- Modified Duty Letters
- Compliance logs and supervisor notes
- Final return-to-work clearance

### 9. Compliance and Enforcement

Failure to comply with this policy, including refusal of medically appropriate duties or violation of physician restrictions, may result in:

- Suspension or termination of Workers' Compensation benefits
- Disciplinary action, up to and including termination, per the Safety Violation and Disciplinary Policy

# 10. Discretion

While the company endeavors to offer suitable modified duty assignments, Hi-Tech Electric Company is under no obligation to create or guarantee such positions. All assignments are made at the discretion of the company based on availability and operational need.

**Chad Hunt President** 

Hi-Tech Electric Co.

### **MULTI-EMPLOYER WORKSITE**

On multi-employer worksites where the company does not have the authority to correct hazards such as, but not limited to, guardrail installation, temporary electrical power and lighting, housekeeping, etc., the following procedures shall be followed:

- 1. Project supervisor should notify the controlling contractor or owner of the hazard and note in writing the time and date of the notification.
- 2. The Project supervisor should inform all employees of the hazard and instruct how to avoid or minimize the dangers associated with the hazardous condition. Also, where feasible, take an alternate means of protecting employees.

#### SUBSTANCE ABUSE PROGRAM

#### 1. OBJECTIVES

Local Union 305 of the International Brotherhood of Electrical Workers (IBEW) and the Central Indiana Chapter of the National Electrical Contractors Association (NECA) are firmly committed to the safe and efficient performance of work in the electrical contracting industry. The safety and health of employees and the quality of workmanship are of paramount concern. The use, possession, manufacture, or distribution of alcohol and/or drugs is inconsistent with the achievement of these objectives, therefore, the parties resolve to combat chemical abuse in any form and encourage every individual in the industry to join in this effort.

The union and the employers advocate fair rules of employment, dignity of workers, and sensitivity for troubled or afflicted persons. Accordingly, the parties will strive to alleviate substance impairment through generally accepted methods of testing, education and training, and rehabilitation. Furthermore, the parties recognize the need to insure privacy and confidentiality to the greatest extent possible consistent with the stated objectives of this program.

### 2. INTRODUCTION

The procedures and guidelines contained in this document delineate essential information about the implementation and administration of the Quality Connection Substance Abuse Program. It is recognized that no set of standards and guidelines, however complete, can address all situations which may arise. Instead, this document is designed to be a basic framework, and the procedures and guidelines set forth herein are to be applied using fundamental fairness, sound judgment, and common sense.

### 3. DEFINITIONS

Accident/incident: An accident is an event caused by an employee, either directly or indirectly, resulting in treatment by a health care provider, or resulting in damage to property, An incident is an event which has all the attributes of an accident, except that no harm was caused to person or property.

Adulterated Specimen.' A specimen which contains an added substance or chemical intended to mask the presence of drugs.

Alcohol: The intoxicating agent in beverage alcohol, ethyl alcohol, or other low molecular weight alcohols.

Alcohol Concentration: The alcohol in a volume of breath expressed in terms of grams of alcohol per 210 liters of breath.

Annual.' Any period of twelve (12) consecutive months in which an employee is obligated to be tested for drugs.

Breathalyzer . An evidential breath testing device approved by the National Highway Traffic Safety Administration (NHTSA) for alcohol testing.

Certified Laboratory. A laboratory which has met the standards set forth in Subpart F from "Procedures for Transportation Workplace Drug and Alcohol Testing Programs" and is approved by the Substance Abuse and Mental Health Services Administration (SAMHSA) of the Department of Health and Human Services (DHHS) to conduct drug testing for federal agencies.

Chain of Custody. Procedures to account for the integrity of each specimen by tracking its handling and storage from point of collection to final disposition.

Collection Site: A designated location where employees present themselves for the purpose of providing a specimen of their urine to be analyzed for the presence of drugs.

Controlled Substance: A drug or other substance listed in Schedules I-V of the "Controlled Substances Act of 1970," as amended.

Confirmation Test. A second analytical procedure performed by a certified laboratory to identify the presence of a specific drug or metabolite. This procedure is independent of the screening test and uses a different technique and chemical principle from that of the screening test in order to ensure reliability and accuracy. (See also: GC/MS)

Counterfeit Drug Card: A card certifying compliance with this Substance Abuse Program will be considered counterfeit if it is modified in any manner without proper authorization, or if it was not issued to the person using it to verify compliance with the program.

Cut-off Level: The value at or above which a specimen is considered positive and below which it is considered negative.

Database• Administration: An independent third party responsible for recording test results, issuing drug cards. providing notification for annual tests, and keeping a current record of each employee's compliance status with this program.

Diluted Specimen. Diluted specimens are usually caused by either consuming a large volume of fluids or by adding water to a discharged sample. A diluted specimen contains a specific gravity of less than 1.003 and a creatinine concentration below 20mg/dl.

Employee: Any person covered by the terms and conditions of a collective bargaining agreement between the Central Indiana Chapter of the National Electrical Contractors Association and Local Union 305 of the International Brotherhood of Electrical Workers which contains the enabling language for this Substance Abuse Program,

Employer.' An individual firm assented to a collective bargaining agreement between the Central Indiana Chapter of the National Electrical Contractors Association and Local Union 305 of the International Brotherhood of Electrical Workers which contains the enabling language for this Substance Abuse Program.

Enzyme Immunoassay: A screening method operating on the principle of antigen-antibody interaction. Enzyme immunoassay tests have limited accuracy, therefore, specimens testing positive must be confirmed by a more reliable second test.

Gas Chromatography/Mass Spectrometry (GC/MS): The current state-of-the-art technique in analytical toxicology used for confirmatory tests. GC/MS is the most sensitive and specific procedure commonly used for drug identification.

He/His. As used in this document, the terms "he" or "his" or similar masculine pronouns shall be construed to include the feminine alternatives of such pronouns. Such terms are used solely for grammatical purposes and shall not be construed to limit this program or its application on the basis of gender.

Medical Review Officer (MRO): A licensed physician responsible for receiving laboratory results generated by a drug testing program, who has knowledge of substance abuse disorders and who has appropriate medical training to interpret and evaluate an individual's confirmed positive test result together with his or her medical history and any other relevant biomedical information.

Negative Test Result.' A negative test result is reported if: (1) the screening test indicates that no substances were present at or above the established cut-off levels, or (2) the screening test indicates the presence of a substance(s) at or above the established initial cut-off level(s), but the confirmation test indicates that no substances were present at or above the established confirmatory cut-off levels.

Owner: A corporation, agency, person, or other entity which hites contractors to perform construction and/or maintenance work.

Positive Test Result (Alcohol): A positive alcohol test result is reported if the breathalyzer test, or a more reliable test, indicates the presence of alcohol at or above the established cut-off levels.

Positives Test Result (Drugs): A positive test result is reported from the laboratory to the Medical Review Officer (MRO) if both the screening test and the confirmation test indicate the presence of a substance(s) at or above the established cut-off levels. A positive test result is reported from the Medical Review Officer (MRO) to the employer after the MRO has reviewed the test results with the employee and determined that the positive results do not stem from the proper use of prescription medicines, over the counter medicines, or any other medically acceptable reason.

Probable cause shall be defined as those circumstances, based on objective evidence about the employee's conduct in the workplace, that would cause a reasonable person to believe that the worker is demonstrating signs of impairment due to alcohol or other drugs.

Random Testing. A method of testing conducted upon an employee population without the employees' prior knowledge of exactly when specimens will be collected.

Screening Test (or Initial Test): An enzyme immunoassay screen used to eliminate "negative" urine specimens from further analysis.

Substance Abuse Professional (SAP): A licensed physician (Medical Doctor or Doctor of Osteopathy); or a licensed or certified psychologist, social worker, or employee assistance professional; or an addiction counselor certified by the National Association of Alcoholism and

Drug Abuse Counselors Certification Commission. All must have knowledge of and clinical experience in the diagnosis and treatment of alcohol and controlled substances related disorders.

Substituted Specimen: A specimen which has been brought into the collection site and is not the donor's discharge.

### 4. TESTING

- 4.1 Circumstances for Drug Testing: Listed below are the circumstances under which an employee will be required to submit to a urine drug test:
  - Annual: An employee is required to be drug tested each year, within fourteen (14) calendar days prior to the expiration date of his/her valid drug card.

It shall be the responsibility of each employee to make certain that his/her drug card remains valid by submitting to the required annual test within the fourteen (14) day period. The database administrator will attempt to notify each employee by regular mail, sent to his/her last known address, no more than fourteen (14) days prior to the expiration date of his/her drug card. However, the lack of such notice shall not be an excuse for an employee's failure to be tested in a timely manner.

Employees shall make arrangements to take the annual drug test on their own time, outside scheduled working hours, except for employees assigned to projects where on-site testing facilities (either mobile or permanent) are made available.

An individual who is not a member of Local Union 305 (e.g. Group II, III, IV journeymen), or an individual who is a member of the local union but was unemployed or was working outside the jurisdiction of the local union when his/her drug card expired, or a newly organized worker, shall submit to a drug test within five (5) working days following employment with a covered employer.

• Post Accident/Incident: It shall be the employer's responsibility to have employees tested for drugs following a work related accident or incident. Drug testing must be completed within thirty-two (32) hours of the accident/incident, or as soon as possible following medical treatment.

In instances of post accident/incident or probable cause testing (for drugs or alcohol), the employee will be transported to the testing facility by the employer, or be tested at the work site. At the option of the employer, the employee may be suspended pending the test result. In the event a negative test result is reported, the employee shall be compensated for all lost time.

When an employee is injured in a qualifying accident, priority must be given to the employee's medical treatment before any consideration is given to collecting a specimen for testing. • Probable Cause: An employee may be tested for drugs if a reasonable suspicion exists that the employee is impaired by drugs.

A determination of probable cause (either for drugs or alcohol) must be based on specific, contemporaneous observations, made by a qualified supervisor, concerning the appearance, behavior, speech, and/or body odors of an employee. Such observations must be documented and a copy of all documentation shall be furnished to the employee.

In order to make a determination of probable cause, a supervisor must have completed training on the effects of alcohol and controlled substances usage. Such training shall cover the physical, behavioral, speech, and performance indicators of probable alcohol misuse and use of controlled substances and shall be conducted by a qualified instructor.

• Random: A minimum of two percent (2%) of all covered employees shall be tested randomly each month so that at least twenty-five percent (25%) of employees will be randomly tested each year. Employees will be chosen anonymously from a computerized selection program. The employee and the employee's current employer will be notified by regular mail of the random selection. The notification letter will state that the employee must report for a test at an approved collection site within seventy-two (72) hours of receiving notification. In the event that an employee has failed to report for a random test within the required time frame, the Database Administrator will evaluate and determine if an employee has a valid reason for failing to report for the random test (e,g, vacation, working out of jurisdiction, unemployed, wrong mailing address). The Database Administrator will contact the employee's last known employer to obtain documentation of any valid reasons for the failure to report for testing. If the employee has a valid reason, then a refusal to test will not be issued for that instance.

An employee may be tested on a random basis when such testing is mandated by an owner. Employee selection should not be discriminatory or arbitrary. The costs of owner mandated random drug testing shall be borne by the owner and/or employer.

Return to Work & Follow-Up: An employee who has tested positive for drugs will be required to obtain a negative test result before returning to work. The return to work urine test shall be authorized by a substance abuse professional. (See also: Consequences of a Confirmed Positive Test Result)

At the employee's expense, a minimum of three follow-up tests in the twelve (12) month period after the return to work test shall be prescribed by a substance abuse professional in conjunction with a treatment program. Follow-up tests are scheduled without an employee having prior knowledge.

4.2 Circumstances for Alcohol Testing: Listed below ate the circumstances under which an employee may be required to submit to an alcohol test:

- Post Accident/Incident: It shall be the employer's responsibility to have employee's tested for alcohol following a work related accident or incident. Alcohol testing should be conducted within two (2) hours of the accident/incident, if at all possible.
- Probable Cause: An employee may be tested for alcohol if a reasonable suspicion exists that the employee is impaired by alcohol.

### 5. TESTING PROTOCOLS

- 5.1 All substance abuse testing shall, at a minimum, be conducted in accordance with the Department of Transportation's "Procedures for Transportation Workplace Drug and Alcohol Testing Programs" as set forth in the Federal Register. Only laboratories certified by the Department of Health and Human Services/Substance Abuse and Mental Health Services Administration (DHHS/SAMHSA) will perform urine drug testing.
- 5.2 Employees will be required to furnish photo identification, a unique identification number (e.g. substance abuse identification card number) and their drug testing authorization at the collection site prior to testing.
- 5.3 Urine specimens will be collected from employees utilizing standardized procedures which ensute both individual privacy for the donor (unless an attempt is made to dilute, substitute, or adulterate a specimen) and proper chain-of-custody of the urine sample. Collection procedures will be consistent with federal standards for collection. The employee will be afforded privacy for the urine collection unless (1) the collector observes evidence of an employee's attempt to tamper with a specimen, or (2) the temperature range of the original specimen presented by the employee to the collector was out of normal range, or (3) the specimen appeared to have been tampered with, or (4) the employee's previous specimen was determined to be an invalid specimen by the laboratory. Under these circumstances, the employee will be required to provide a second specimen under direct observation before the employee leaves the collection facility. Should the employee refuse to provide the second specimen as required, a refusal to test will be issued which carries the same consequences as a confirmed positive test.
- 5.4 Urine specimens will be screened initially by a federally approved enzyme immunoassay and presumptively positive specimens must be eonfirmed by gas chromatography/mass spectrometry (GC/MS).
  - 5.5 The drugs to be tested for, and the applicable cut-off levels, are as follows:

Drug Screening Levels rig/ml Confirmation Levels ngfml

Amphetamines 500

Amphetamine 250

Methamphetamine MDMA (Ecstasy) 500 250 250

Cocaine Metabolites 150 100

PCP-Phencyclidine 25 25

Opiate Metabolites 2000

6-Acetylmorphine 10 10

Morphine 2000

Codeine 2000

Marijuana Metabolites 50 15

Barbiturates 300 200

Benzodiazepine 300 300

Methadone 300 300

Propoxyphene 300 300

Methaqualone 300 300

These test levels are subject to change in order to conform with the levels set forth in the "Procedures for Transportation Workplace Drug and Alcohol Testing Programs."

- 5.6 The cut-off levels for alcohol testing shall be equivalent to the values established by the Department of Transportation (DOT) under its Commercial Drivers License guidelines. Currently, an alcohol concentration of .04 or greater is considered positive.
- 5.7 All test results will be forwarded to the Medical Review Officer (MRO) for verification. The MRO will advise the database administrator of all negative tests and the issuance of a drug card will be initiated.

In addition to a drug card, employees who test negative will receive a twenty-five dollar (\$25) check from the Quality Connection in recognition of their efforts to comply with the program. This \$25.00 bonus is a gratuitous bonus to the participant. A participant shall be deemed to have waived any claim to this bonus in the event that the \$25.00 check is not cashed within 90 days of its issuance. This waiver provision shall be applied to all participants in the Quality Connection Substance Abuse Program dating back to the implementation of the Program.

Temparary changes to the substance abuse program have been made in an effort to avoid unnecessary costs. In particular, those individuals with expiring cards will not be notifleél and authOFiZed to test until they are called for employment. Also, unindentureds will no longer receive a \$25 check following their initial negative test, however, the reimbursement z'ill be made for the next annual and any random test.

5.8 If the results of both the screening test and the confirmation test are positive, or the specimen was substituted or adulterated, the donor will be contacted by the MRO and given the opportunity to provide the MRO with any legitimate medical reason(s) they wish to offer for the positive test or untestable specimen. If the MRO's determines there is a legitimate, verifiable

medical explanation for the positive test result or composition of the specimen, the result will be treated as equivalent to a negative laboratory test. If not, it will be considered a confirmed positive result. Exceeding the prescribed dosage of a legal drug or using another person's medication will not be acceptable reasons.

The MRO may verify a test as positive without having communicated with the employee about the test if: (1) the employee expressly declines the opportunity to discuss the test, or

- (2) the MRO, after making all reasonable efforts, is unable to contact the employee.
  - An employee testing positive shall have the right to direct the MRO (within 48 hours) to have the secured remaining portion of the urine sample independently retested by a certified laboratory of his or her choice at his or her own expense. If the independent retest is negative, the employee shall be reimbursed for the cost of such independent test plus be compensated for any lost time.
  - An employee providing a diluted specimen will be given the opportunity to return to a collection site within twenty-four (24) hours to provide a second specimen, on his/her own time. Employees should refrain front excessive consumption of fluids prior to the retest.
  - No adverse action or discipline shall be taken against any employee on the basis of a first diluted specimen. A second diluted specimen, without a valid medical reason, will be treated as equivalent to a confirmed positive test.
- 5.9 An employee who refuses to submit to any test required by this Substance Abuse Program, substitutes or adulterates a urine specimen, or uses or possesses a counterfeit drug card will be reported as having received a confirmed positive test. In addition, the employee shall be subject to employer discipline, up to and including discharge.
- 5.10 No adverse action or discipline shall be taken against any employee on the basis of an unconfirmed positive test result,

### 6. CONSEQUENCES OF A CONFIRMED POSITIVE TEST RESULT

- 6.1 In the case of a confirmed positive drug or alcohol test, the employer's designated contact person will be notified that the employee no longer has a valid drug card. Employers will not be required to retrieve a voided drug card.
- 6.2 An employee who tests positive for drugs and/or alcohol shall be ineligible to work for a minimum of thirty (30) days (measured from the date that the test result was reported to the contractor) and will be directed to a qualified Substance Abuse Professional (SAP) for consultation and review.
- 6.3 Before returning to work, an employee must (1) complete an evaluation with a qualified Substance Abuse Professional, (2) follow treatment prescribed by the SAP, (3) obtain written documentation from the SAP verifying fitness for duty, (4) obtain a negative result on a return-to-work test. (Documentation from the SAP must be presented to the database

administrator prior to taking the test), and (5) agree to submit to a minimum of three (3) followup tests in the twelve (12) month period after the return-to-work test.

6.4 A confirmed positive test result shall not be the sole basis for termination of employment. Only employees who are in noncompliance with this Substance Abuse Program may be discharged. For the purposes of this provision, "noncompliance" shall mean the following:

failure to report to a Substance Abuse Professional as directed, (2) failure to follow and/or complete a SAP-prescribed treatment program, or (3) failure to take a return-to- work or follow-up test.

6.5 An individual testing positive for a second time shall be ineligible to work for a minimum of ninety (90) days and an individual testing positive for a third time in a 5 year period, shall be ineligible to work for one (1) year under any collective bargaining agreement that recognizes this substance abuse program. The individual must also complete a SAP-prescribed treatment program, at his/her own expense, before returning to work.

### 7. EMPLOYER RESPONSIBILITIES

- 7.1 Employers shall prohibit the unlawful use, possession, consumption, manufacture, or distribution of controlled substances in the workplace.
- 7.2 Employers shall furnish the names of a primary and secondary contact person to handle all communications and/or correspondence associated with this program. For reasons of confidentiality, only these persons will be contacted regarding employee test results or other sensitive information. Employers will be responsible for notifying the database administrator of any changes in their designated contact persons.
- 7.3 The Employer shall be responsible for contacting the database administrator to verify that each employee, or applicant for employment, covered by this substance abuse program possesses a valid drug card, Employers shall not employ individuals who do not possess a valid drug card (except for certain new hires who may have five working days to be tested).
- 7.4 It shall be the responsibility of the Employer to comply with the substance abuse policy requirements of an owner, when such requirements are more stringent than those set forth in this document.
- 7.5 Employers are responsible for providing post accident and probable cause test results to the database administrator.
- 7.6 Employers shall take all reasonable and necessary precautions to protect the confidentiality of test-related information.

#### 8. EMPLOYEE RESPONSIBILITIES

8.1 Employees shall report to work fit for duty, including being in the appropriate mental and physical condition necessary to perform work in a safe, competent manner, free from the influence of drugs and alcohol.

- 8.2 Employees are required to carry a valid drug card at all times during work hours. Upon request, an employee shall present his/her drug card to an employer or owner, either at the time of employment or during work hours. Employees shall be responsible for the replacement of lost or stolen drug cards.
- 8.3 An employee shall consent to the release of drug test results to the database administrator as well as his/her employer. Also, the employee will comply with all owner mandated substance abuse policy requirements not inconsistent with this Program.
- 8.4 In accordance with the Drug Free Workplace Act of 1988, an employee must notify management of any criminal conviction for a drug-related offense occurring in the workplace, not later than five (5) days after such conviction.
- 8.5 Employees are encouraged to seek voluntary assistance for substance abuse problems. Seeking voluntary assistance will not be considered the equivalent of having obtained a positive test result.

#### 9. COMPLIANCE AUDITS

In order to maintain the integrity and effectiveness of the Quality Connection Substance Abuse Program, it is essential that employers comply with Article VII, Section (C). As a means to ensure such compliance, The Quality Connection and/or the Labor-Management Committee reserves the right to audit any or all signatory employers and assess penalties for program violations.

Such audits may be conducted on a regularly scheduled basis, on a random basis, or in conjunction with the investigation of a complaint. Employers shall cooperate in the auditing process and any employer who refuses or impedes an audit shall be subject to the maximum penalties available.

The purpose of an employer audit will be to verify that all covered employees possess a valid drug card. If it is determined that any employees are working without a valid drug card (except for certain new hires who may have five working days to be tested), an employer may be assessed as follows:

First thirty (30) days of employment without a valid card: \$10 per employee per day. Thirty-first (31st) days of employment and beyond: \$50 per employee per day.

Assessments shall be payable to "The Quality Connection of Fort Wayne, Inc." If an employer believes that an assessment is erroneous or unfair, an appeal can be made to the Labor-Management Committee. If an employer fails to remit, then the Union shall have the option, upon seventy-two (72) hours written notice to such delinquent Employer, and with a copy of the same to the Chapter to direct its members to cease work for that Employer. The parties to this Agreement agree that such action will not be in violation of Article I, Section 1.04. The Quality Connection shall be responsible for the enforcement of this provision and the collection of all assessments.

### 10. GENERAL PROVISIONS

- 10.1 Grievance Procedure: Any alleged violation of this program shall be subject to the grievance procedure outlined in the collective bargaining agreement.
- 10.2 Amendments: This program is subject to change or supplement at any time by mutual agreement between the Central Indiana Chapter, NECA and Local Union No. 305, IBEW.
- 10.3 Effect of Law / Separability: Nothing contained in this document is intended, nor shall be construed, to authorize any action that is contrary to federal or state law.

Should any provision of this document be declared illegal by any court of competent jurisdiction, such provision shall immediately become null and void, leaving all remaining provisions in full force and effect and the parties shall, thereupon, seek to negotiate substitute provisions which are in conformity with the applicable laws.

Adopted November 2014

#### **COMPENSATION AND BENEFITS**

## **Payroll and Salary Administration Policy**

- 1. Purpose The purpose of this Payroll and Salary Administration Policy is to establish guidelines and procedures for the administration of payroll and salary processes at HiTech Electric Company. This policy ensures fair and consistent treatment of all employees while complying with applicable laws and regulations.
- 2. Scope This policy applies to all regular full-time and part-time employees of Hi-Tech Electric Company in Indiana.

# 3. Payroll Schedule

- 3.1. Pay Periods: The company operates on a weekly pay period schedule. The pay periods begin on Monday and ends on Sunday. All employees are required to accurately record their working hours, leave time, and any other relevant information in the designated time and attendance system.
- 3.2. Pay Dates: Employees will be paid on Wednesday, following the end of each pay period. In case a pay date falls on a weekend or public holiday, employees will receive their pay on the preceding business day.

# 4. Salary Administration

- 4.1. Compensation Philosophy: Hi-Tech Electric Company is committed to offering competitive salaries and benefits to attract and retain talented employees. The company will regularly review and benchmark salaries against industry standards to ensure fair and equitable compensation.
- 4.2. Salary Structure: The company maintains a salary structure that provides a framework for determining salary ranges for different positions within the organization. The structure takes into account job responsibilities, required qualifications, market rates, and internal equity considerations.

## 5. Payroll Deductions

5.1. Payroll Deductions: The company may deduct statutory and voluntary deductions from employees' paychecks, including but not limited to taxes, social security contributions, retirement plan contributions, health insurance premiums, and other authorized deductions. Deductions will be made in compliance with applicable laws and regulations.

### 6. Wage and Hour Laws

- 6.1 Hi-Tech Electric complies with Indiana's minimum wage laws, which are adjusted annually.
- 6.2 Non-exempt employees are entitled to overtime pay at 1.5 times their regular rate for hours worked over 40 in a workweek.

## 7. Payroll Discrepancies and Inquiries

- 7.1. Discrepancies: If an employee identifies any discrepancies in their paycheck, such as missing or incorrect payments, they should promptly notify the payroll department. The payroll department will investigate and rectify the issue as soon as possible.
- 7.2. Inquiries: Employees with questions or inquiries regarding their payroll, tax withholdings, or other related matters should contact the payroll department for assistance.

# 8. Final Paycheck & Termination

- 8.1 Employees who are terminated receive their final paycheck no later than the next scheduled payday in compliance with Indiana State law and the collective bargaining agreement.
- 8.2 Employees who voluntarily resign will be paid their wages on the next regularly scheduled payday in compliance with Indiana State law and the collective bargaining agreement.
- 9. Compliance with Laws and Regulations Hi-Tech Electric Company is committed to complying with all applicable federal, state, and local laws and regulations governing payroll administration, including but not limited to minimum wage requirements, overtime regulations, tax withholdings, and reporting obligations.
- 10. Policy Violations Any violations of this Payroll and Salary Administration Policy may result in disciplinary action, up to and including termination of employment, in accordance with the company's disciplinary policy.
- 11. Policy Review This policy will be reviewed periodically by the Human Resources department to ensure its continued effectiveness and compliance with changing laws and regulations. Any necessary updates or revisions will be made, and employees will be notified of any significant changes.

Payroll Department Contact: kspears@hi-techelectric.net

By adhering to this Payroll and Salary Administration Policy, Hi-Tech Electric Company aims to maintain transparency, fairness, and compliance in its payroll processes while providing employees with competitive compensation and benefits.

## **Employee Benefit Plan**

For the purposes of this policy, Hi-Tech Electric Company defines a 'year' as beginning on January 1st and running for 12 consecutive months.

- 1. Paid Time Off (PTO):
  - 1.1 Non-bargaining employees will receive PTO annually, starting in January of the current year unless otherwise stated in your offer letter.
  - 1.2 PTO hours will be paid at the employee's straight time rate of pay.
  - 1.3 Employees may take the PTO in increments of 15 minutes.
  - 1.4 Each employee is allowed to take one week (40 hours) of continuous vacation unless prior approval from management has been obtained.
  - 1.5 Unused PTO hours will be forfeited if the employee quits or is terminated.
  - 1.6 PTO hours may not be carried over to the following year.
  - 1.7 For new hires, PTO hours will be prorated based on your start date. If hired in Q1, you will receive the full number of PTO hours. If hired in Q2, you will receive 75%. If hired in Q3, you will receive 50%. If hired in Q4, you will receive 0 hours until January of the following year.
  - 1.8 Employees are expected to provide reasonable advance notice for the use of PTO whenever possible, except in cases of unforeseen or emergency circumstances.
  - 1.9 Non-bargaining employees need to fill out a PTO request form and submit it to their supervisor.
- 2. Holiday Pay: Non-bargaining employees will receive holiday pay at 8 hours of straight time pay for the following holidays: New Year's Day, Memorial Day, July 4th, Labor Day, Thanksgiving, Day after Thanksgiving and Christmas Day. Bargaining employees get double-time pay if they work on these holidays.
- 3. Family and Medical Leave
  - 3.1 Employees are entitled to leave for jury duty, voting, and crime victims' rights proceedings without penalty.
  - 3.2 Employees may use PTO for these types of leave.
  - 3.3 Eligible employees may take up to 12 weeks of unpaid, job-protected leave in a rolling 12-month period for the following reasons:
    - Personal medical leave
    - Family care leave

- Parental leave birthing or bonding
- Adoption or foster care placement
- Qualifying Military leave
- 3.4 FMLA leave is unpaid. However, Hi-Tech Electric requires that employees first use available paid time off (PTO, sick leave, or vacation) concurrently with FMLA leave. While on FMLA leave, Hi-Tech Electric will continue the employee's group health insurance coverage under the same terms and conditions as if the employee were actively working.
- 3.5 Upon return from FMLA leave, employees will be restored to their original job or to an equivalent job with equivalent pay, benefits, and other terms and conditions of employment, unless otherwise permitted by law.
- 3.6 Employees must provide 30 days' advance notice for foreseeable leave.
  - 3.6.1 If the leave is unforeseeable, notice must be given as soon as practicable.
  - 3.6.2 Certification by a health care provider is required for leave due to serious health conditions.
  - 3.6.3 Recertification may be required periodically.

#### 4. Health and Welfare:

- 4.1 Health and welfare benefits will be provided at no cost to the employee.
- 4.2 The specific details of the health and welfare benefits will be outlined in the company's health and welfare plan.
- 4.3 Hi-Tech Electric offers short-term, long-term, and weekly disability insurance in accordance with the provisions of our health benefits plan. Coverage details, eligibility requirements, and benefit specifics are outlined in the official health plan documents. Employees are encouraged to refer to those documents or contact Human Resources for additional information.

#### 5. Call-In Procedure:

- 5.1 Employees who are unable to report to work must notify their supervisor before their scheduled start time.
- 5.2 Employees must call or email their direct supervisor and leave a voicemail or send a text if the call is not answered.
- 5.3 Failure to notify a supervisor may result in disciplinary action.
- 5.4 If the absence extends beyond one day, the employee must contact their supervisor each day unless otherwise instructed.
- 5.5 If an employee is absent for three consecutive workdays without notification, it may be considered job abandonment.

6. Unpaid Time Off: Requests for unpaid time off outside of FMLA or other protected leave programs may be granted at the sole discretion of the employee's manager, based on business needs, staffing levels, and the nature of the request. Approval is not guaranteed and must be obtained in advance. Employees are encouraged to submit such requests as early as possible to allow for adequate planning and coverage.

#### 7. Pension Benefit Statement

We are pleased to provide you with your pension benefit statement. At Hi-Tech Electric Company, we value your dedication and commitment to the organization, and we are committed to supporting your retirement goals. Employees are eligible to receive a SEP pension starting January 1st of their third year of employment.

#### Pension Contributions:

Two separate pensions with a combined percentage of gross wages

According to industry reports, the average 401(k) employer matches in 2023 ranges from 4% to 6% of an employee's salary. At Hi-Tech Electric Company, we believe in providing above-average contributions to employee retirement plans to help you secure a comfortable retirement. Please note that for apprentice electricians, the pension contribution is closer to the national average for employer contributions. However, employees are not required to contribute any portion of their wages towards the pension.

All Journeyman Electricians: Pension Contribution Percentage: See letter statement.

Apprentice Electricians: Pension Contribution Percentage: See letter statement.

We hope this pension benefit statement provides you with a clear understanding of the retirement benefits you are entitled to as an employee of Hi-Tech Electric Company. If you have any questions or need further assistance, please do not hesitate to reach out to our Human Resources department.

Thank you for your hard work and dedication to our organization.

Sincerely,

Mac Thank

## **Expense Reimbursement Policy**

- 1. Purpose The purpose of this Expense Reimbursement Policy is to establish guidelines and procedures for employees of Hi-Tech Electric Company regarding the reimbursement of business-related expenses incurred during their duties. This policy aims to ensure that expenses are reasonable, necessary, and incurred in accordance with the Company's goals and objectives.
- Eligibility This policy applies to all employees, contractors, and authorized representatives of the Company who incur business-related expenses on behalf of the Company. To be eligible for reimbursement, expenses must be pre-approved by the appropriate supervisor or manager, unless it is an emergency where prior approval was not feasible.
- 3. Expense Categories The following expense categories are eligible for reimbursement, subject to the guidelines and limits outlined in this policy:
  - 3.1 Travel Expenses: This includes transportation (airfare, train tickets, car rental, etc.), accommodation, meals, and incidentals related to authorized business travel.
  - 3.2 Field expenses: This includes tools and equipment, materials and supplies, permits, licensing fees etc.
  - 3.3 Office Supplies and Equipment: Employees may be reimbursed for office supplies and equipment necessary to perform their job duties, subject to budgetary restrictions and managerial approval.
  - 3.4 Professional Development: The Company may reimburse employees for expenses related to professional development activities, such as conferences, workshops, and seminars, that are directly relevant to their job responsibilities and approved in advance.
  - 3.5 Other Expenses: Other business-related expenses not covered under the above categories may be considered for reimbursement on a case-by-case basis, subject to managerial approval.
- 4. Expense Approval Process To request reimbursement for an expense, employees must follow the following process:
  - 4.1 Obtain Pre-Approval: Employees must seek prior approval from their supervisor or manager for all anticipated expenses, except in emergency situations where prior approval is not feasible.
  - 4.2 Submit Work Order/Expense Report: Within 7 days of incurring the expense, employees must submit receipts, invoices, or other supporting documentation for each expense item to the payroll department.
  - 4.3 Expense Review and Approval: The expense report will be reviewed by the appropriate supervisor or manager to ensure compliance with this policy. Any

discrepancies or issues may be discussed with the employee before final approval or reimbursement is granted.

- 4.4 Reimbursement Process: Approved expenses will be reimbursed the following day via direct deposit into the account where the employee receives their paychecks. Reimbursements will be made in accordance with applicable tax regulations.
- 5. Expense Limits and Guidelines The Company has established the following limits and guidelines for expense reimbursement:
  - 5.1 Travel Expenses: Employees traveling for work-related purposes will receive a per diem allowance for lodging and meals, with the applicable rate determined by the travel location. Employees are responsible for arranging and booking their own accommodation in a cost-conscious and professional manner, consistent with company standards.
  - 5.3 Office Supplies and Equipment: Expenses for office supplies and equipment must be reasonable and directly related to an employee's job duties. Employees should consult with their supervisor or manager for any significant or high-value purchases.
  - 5.4 Professional Development: The Company may set limits on the amount or frequency of reimbursement for professional development activities. Employees should seek approval before registering or incurring any expenses.
  - 5.5 Other Expenses: Expenses not falling into the defined categories may be considered for reimbursement on a case-by-case basis. The employee must provide a detailed explanation of the expense and seek appropriate managerial approval.
- 6. Compliance and Reporting: All employees are responsible for complying with this policy and accurately documenting their expenses. Any fraudulent or intentionally misleading expense claims may result in disciplinary action, up to and including termination. Employees are encouraged to report any concerns or violations of this policy to their supervisor, manager, or the Human Resources department.
- 7. Policy Review: The Company will periodically review this Expense Reimbursement Policy to ensure its effectiveness and compliance with applicable laws and regulations. Any updates or revisions to the policy will be communicated to employees in a timely manner.

Payroll Department Contact: kspears@hi-techelectric.net Human Resources: humanresources@hi-techelectric.net

By adhering to this Expense Reimbursement Policy, Hi-Tech Electric Company aims to maintain transparency, fiscal responsibility, and fairness in the reimbursement of business-related expenses.

## **Anti-Corruption and Fraud Prevention Policy**

- 1. Introduction Hi-Tech Electric Company is committed to the highest standards of integrity, transparency, and ethical conduct. This policy outlines our zero-tolerance stance on corruption, bribery, fraud, and conflicts of interest, ensuring compliance with applicable laws and EcoVadis standards.
- 2. Scope This policy applies to all employees, executives, managers, contractors, consultants, vendors, and third-party partners engaged in business with Hi-Tech.

## 3. Anti-Corruption and Bribery Commitment

- Hi-Tech prohibits all forms of corruption, including bribery, extortion, facilitation payments, and kickbacks.
- Employees and business partners must not offer, solicit, or accept bribes or any undue advantage to influence business decisions.
- All transactions must be conducted transparently, fairly, and in compliance with anticorruption laws.

#### 4. Fraud Prevention Measures

- Code of Conduct: Employees must adhere to Hi-Tech's Code of Conduct, which reinforces ethical business practices.
- Financial Controls: All financial transactions must be accurately recorded and subject to audits.
- Segregation of Duties: No single individual should have sole control over critical processes.
- Fraud Risk Assessment: Regular assessments will be conducted to identify and mitigate fraud risks.
- Reporting Mechanisms: Confidential channels, including a whistleblower hotline, are available for reporting suspected fraud or misconduct.
- Training and Awareness: Regular anti-corruption and fraud prevention training will be provided to employees and stakeholders.

### 5. Conflict of Interest

- Employees must avoid situations where personal or financial interests may compromise business decisions.
- Any actual or potential conflicts must be disclosed and managed appropriately.
- Employees shall not misuse company resources or information for personal gain.

## 6. Anti-Corruption Due Diligence for Third Parties

- Third parties must undergo a risk-based due diligence assessment before engagement.
- Contracts with third parties will include anti-corruption clauses.

- Ongoing monitoring and compliance reviews will be conducted to ensure adherence to anti-corruption standards.
- Background checks and screenings of third parties against sanction lists, PEP databases, and adverse media reports will be conducted.
- Third parties must demonstrate their commitment to anti-corruption measures through documented policies and training.

# 7. Anti-Corruption and Bribery Awareness Training

- All employees will undergo annual training covering corruption risks, anti-bribery laws, and ethical decision-making.
- Training methods include online modules, in-person workshops, and real-life case studies.
- Employees will be tested on their understanding, and feedback will be incorporated to improve training effectiveness.
- Leadership will reinforce the importance of a corruption-free work environment.

## 8. Investigation and Enforcement

- Reports of suspected violations will be promptly and confidentially investigated.
- Employees or third parties found in violation may face disciplinary actions, including termination and legal consequences.
- Retaliation against whistleblowers is strictly prohibited.
- A dedicated compliance officer will oversee investigations and enforcement actions.

## 9. Continuous Monitoring and Improvement

- This policy will be periodically reviewed and updated to align with legal and industry best practices.
- Fraud prevention measures will be adjusted based on emerging risks and trends.
- Employee and stakeholder feedback will be considered to enhance the effectiveness of anti-corruption initiatives.
- Regular audits and compliance assessments will be conducted to ensure policy adherence.

By implementing and adhering to this policy, Hi-Tech Electric Company fosters a culture of ethical business conduct and accountability, ensuring compliance with EcoVadis standards and international anti-corruption regulations.

#### TRAINING AND DEVELOPMENT

Hi-Tech Electric Company Career Management and Training Policy

Effective Date: 3/1/2025

Version: 2025.1

## 1. Purpose

Hi-Tech Electric Company is committed to fostering employee growth, advancing careers, and maintaining a safe and productive workforce. This policy outlines the structure and strategy of our career management, safety training, and professional development practices.

## 2. Scope

This policy applies to all Hi-Tech Electric Company employees, including field, administrative, technical, and management staff across all business units and locations. It encompasses:

- Career planning and internal mobility
- Onboarding and safety training
- Skills development and leadership training
- Certifications and compliance tracking
- Evaluation and performance management
- Grant-funded learning programs

#### 3. Core Commitments

- Promote internal career advancement.
- Provide regular training through grants like Going PRO and Next Level Jobs.
- Use RIVET to track all certifications, training completions, and Individual Development Plans (IDPs).
- Deliver consistent safety training via the Safety Meeting App and structured site-specific meetings.
- Foster continuous learning through mentorship, cross-training, and leadership programs.

### 4. Career Development Framework

- 4.1 Individual Development Plans (IDPs)
  - Every employee is encouraged to build an IDP with their supervisor.
  - IDPs align personal goals with company growth paths, highlighting skill gaps and training goals.

## 4.2 Internal Mobility

• Job openings are posted internally, with transparent promotion and transfer processes based on performance, skill readiness, and leadership potential.

## 5. Training Programs and Opportunities

- On-the-job training: This involves learning while performing the actual job tasks. It may include shadowing experienced employees, job rotations, or mentoring programs.
- Workshops and seminars: These are short-term training sessions conducted by electricians or expert in the field. They cover various topics, such as communication skills, leadership development, project management, or technical skills.
- Conferences and industry events: Attending conferences and industry events allows employees to stay updated on the latest trends, technologies, and best practices in their field. They also provide networking opportunities.
- Online training courses: Our E-learning platforms offer a range of courses that employees can take at their own pace. These courses cover technical skills, software training, compliance regulations, and soft skills development.
- Cross-functional training: This involves training employees in areas outside of their core responsibilities. It helps our employees gain a broader understanding of the organization and encourages collaboration across different teams.
- Leadership development programs: There are training programs available to develop leadership skills among employees who show potential for management roles. These programs focus on areas like decision-making, strategic thinking, and team management.
- Soft skills development: Soft skills such as communication, teamwork, time management, and problem-solving are crucial for professional success. Our training programs will help employees strengthen these skills.

## 6. Performance and Evaluation

## 6.1 Quarterly Evaluations

- Supervisors receive reminders to complete evaluations every quarter.
- Evaluations use self-assessments, KPIs, manager reviews, and 360-degree feedback.
- Feedback is used to adjust IDPs, recommend training, and guide promotion readiness.

## 6.2 Recognition and Improvement

- High performers may receive bonuses, awards, or promotional opportunities.
- Employees with performance gaps are placed on improvement plans with coaching support.

#### 7. Governance

# 7.1 Leadership Oversight

- Human Resources oversees policy implementation and ensures alignment with employment laws, grant requirements, and DEI principles.
- Operations Managers and Supervisors are accountable for conducting evaluations, approving IDPs, ensuring compliance, and promoting internal development.
- Safety Director and the Corporate Safety Planning Committee maintain oversight of all safety-related training in compliance with OSHA and company policy.

## 7.2 Technology and Records

- RIVET is the system of record for tracking certifications, training completions, role assignments, mentorship activity, and performance evaluations.
- Safety Meeting App is used for documenting weekly toolbox talks and safety sessions.
- Training records, evaluations, disciplinary actions, and grant reporting are retained for audit and compliance purposes.

## 8. Review Mechanisms and Continuous Improvement

## 8.1 Annual Policy Review

- HR, Safety, and Department Heads conduct an annual review to align with:
  - Industry standards and best practices
  - OSHA/regulatory changes
  - Feedback from surveys and mentorship evaluations
  - Workforce analytics from RIVET

### 8.2 Continuous Feedback Loop

• Anonymous surveys, mentorship feedback, and training evaluations are used to refine IDPs and improve program content.

## 8.3 Audit and Compliance Monitoring

- Quarterly audits of training records, evaluations, and certification logs in RIVET.
- Grant compliance is monitored in coordination with state agencies and funding partners.

# Hi-Tech Electric Company Employee Health and Safety Policy

Version: 2025.1 | Effective Date: 3.31.25

1. Purpose

The purpose of this policy is to provide a safe and health-conscious work environment for all employees, contractors, and stakeholders of Hi-Tech Electric Company. Safety is a core value and a condition of employment.

## 2. Scope

This policy applies to:

- All employees, contractors, subcontractors, and visitors across all company divisions and job sites.
- All company activities include operations, construction, warehouse tasks, and officebased duties.
- All phases of work from pre-planning and bidding through job closeout and post-job review.

#### 3. Governance Structure

## 3.1 Executive Oversight

- Corporate management communicates safety commitment, allocates annual safety budgets, and reviews the performance of the Safety Director.
- Safety is embedded in annual performance evaluations for managers, supervisors, and foremen.

### 3.2 Safety Director

- Develops and enforces company-wide safety procedures.
- Conducts audits, hazard assessments, and jobsite inspections.
- Maintains compliance with OSHA, DOT, EPA, NFPA 70E, and client requirements.
- Tracks all safety metrics using a centralized system and maintains OSHA logs.

## 3.3 Supervisors and Managers

- Conduct monthly safety inspections, job hazard analyses (JHAs), and ensure all incidents are reported and investigated within 24 hours.
- Enforce disciplinary procedures and lead daily/weekly safety talks using the Safety Meeting App.
- Translate safety information as necessary and ensure adequate PPE and safety materials are available.

# 3.4 Employees

- Required to follow safety policies and procedures, attend all safety training, report hazards and incidents immediately, and use PPE correctly.
- Empowered to issue a Stop Work if an unsafe condition or act is identified, without fear of discipline.

# 4. Policy Implementation Components

## 4.1 Safety Training

- New hire orientation includes job-specific hazards, company rules, emergency plans, PPE usage, and the President's Health & Safety Statement.
- All employees receive regular training documented in RIVET and supplemented by the Safety Meeting App.
- Specialized training includes OSHA 10/30, confined space, LOTO, fall protection, and emergency response.

## 4.2 Job Hazard Analysis (JHA)

- Required before all new jobs, significant field changes, or when incidents occur.
- Includes both preliminary (pre-bid) and investigative (on-site) assessments.

# 4.3 Emergency Action Plan (EAP)

- Site-specific and reviewed annually; includes evacuation routes, hazard-specific response, and assembly points.
- Coordinated with clients and subcontractors.

## 4.4 Confined Space & LOTO Programs

- Confined space entry requires permits, designated roles, and site-specific planning.
- Only trained, authorized personnel may conduct LOTO procedures.

# 5. Objectives and Metrics

## 5.1 Qualitative Objectives

- Foster a safety-first culture through open communication and training in multiple languages.
- Empower every employee to identify hazards and halt unsafe work.
- Improve employee engagement through recognition of safe performance at the annual company-wide safety meeting.

## 5.2 Quantitative Objectives

- Zero fatalities and serious injuries annually.
- 100% completion of mandatory training for all field personnel tracked in RIVET.
- Conduct monthly safety inspections at 100% of active job sites.
- Resolve 95% of all reported safety issues within 7 days.

- Reduce Total Recordable Incident Rate (TRIR) and Lost Time Injury Frequency Rate (LTIFR) by 10% annually.
- Achieve 90%+ participation in emergency drills and CPR/first aid recertification.

### 6. Review Mechanisms

- Annual Safety Program Review conducted by Safety Director, HR, and executive leadership.
- Results of all audits, incident investigations, and KPIs are reviewed quarterly by the Corporate Safety Planning Committee.
- EAPs, JHAs, and confined space/LOTO programs are updated annually or as conditions change.
- Safety policy updates are communicated via company-wide memos, toolbox talks, and posted documents.

## 7. Compliance and Enforcement

- Safety violations follow a progressive discipline process: verbal warning → written reprimand → suspension → termination (escalated immediately for severe violations).
- All training, violations, and corrective actions are documented.
- Disciplinary data is used to guide retraining and policy updates.

#### SAFETY PROGRAM

#### **PURPOSE**

The purpose of this policy is to provide a complete and clear description of safety responsibilities for all employees. Management safety responsibilities are summarized for each job description. It is important for all employees to understand not only their responsibilities but also the responsibilities of fellow employees.

### **PROCEDURE**

All levels of management and supervision are charged with the responsibility of preventing conditions that could lead to occupational injuries or illness. While the ultimate success of our safety and health program depends upon the full cooperation of each employee, it is management's responsibility to see that safety and health rules and procedures are adequate and enforced, and to see that effective training and education programs are employed to the best advantage.

### RESPONSIBILITY

## Corporate Management

These measures are used to track and update goal progress on an annual basis.

- Communicate the corporate safety commitment and maintain annual safety budgeting for all company operations.
- Audit the safety director and review safety performance annually.
- The safety director and supervisors' annual performance reviews are based on the accuracy of safety documentation, employee training, completion of required field safety responsibilities, and the overall success of the company's safety program.
- Administer Safety Policies and Procedures within the framework of the company Corporate Safety Procedures Manual with particular emphasis on potentially hazardous operations.
- Accompany inspectors during inspections and properly document any events arising out
  of OSHA inspections, corporate safety audits or other formal type safety inspections
  conducted at the division or project site by outside agencies.
- Ensure compliance in the following areas; OSHA compliance programs, employee safety awareness and training, defensive driving policy, monitoring and investigation of worker compensation claims and incident occurrence and reporting requirements are met. (300 Log, First Report of Injury, Insurance Claims, etc.)

### **Human Resources**

- Perform and carry out any other assignments delegated by corporate management.
- Record keeping requirements.

## Managers and Supervisors

- Enforce all safety policies and procedures.
- Ensure all incidents are reported, thoroughly investigated and corrective action is taken.
- Conduct monthly, or more frequent safety inspections. Maintain a formal monthly safety inspection program with a documented report reflecting environmental, safety and health discrepancies and recommendations or appropriate corrective actions by the responsible party.
- Follow up on all reported safety violations to ensure corrective action is taken.
- Initiate, implement and administer safety training in accordance with established project site requirements.
- Prepare and distribute all required project site incident, injury and incident reports.
- Provide relevant safety programs information to site personnel and corporate personnel on site.
- Investigate all incidents, injuries, fires, property damage, and other safety or environmental related incidents, and issue required reports in a timely manner.
- Evaluate the need for and requisition the personal protective equipment, fire protection equipment and other safety-related equipment required to meet the project site's needs during construction or manufacturing operations.
- Display and maintain publicity materials on site bulletin boards, such as posters, safety signs, banners, and distribute safety literature.
- Take immediate corrective action whenever unsafe conditions and when unsafe acts are noted and distribute employee safety reprimands.

## All Employees in the Company

All employee safety responsibilities are defined and in writing.

- Read, understand and follow all company safety policies and procedures.
- Evidence of comprehension by means of testing/documentation.
- Perform all duties in a safe manner.
- Procedures in place for employees to communicate safety hazards. Report all unsafe acts, safety conditions, and incidents or injuries to the supervisor or manager immediately.
- If employee is asked by anyone to perform a task they feel is unsafe, they should report this immediately to the safety director.
- Wear all personal protective equipment that is required and maintain the equipment in good condition.
- Set an example of safe working practice and follow all safety regulations.
- Participate in all safety training sessions.
- Employees shall not conduct tasks in which they have not been trained.
- Communicate all safety improvement suggestions to the supervisor or manager.
- If employees speak a language other than English, all communication will be translated into that language, including word documents, signage and tool box talks.

## Company Safety Director

- Establish safety policy and procedures.
- Monitor safety performance and advise on safety policy matters.
- Communicate safety policies to the various operating center safety committees.
- Monitor legislation and regulation changes as they relate to the safety policy.
- Receive training necessary to accomplish designated tasks detailed in the job responsibilities.
- Advise on recommended policy changes.
- Identify and evaluate job hazards and recommend corrective action.
- Make safety equipment recommendations.
- Evaluate and recommend training requirements and safety training programs for job superintendents.
- Recommend policy enforcement procedures.
- Monitor program effectiveness and recommend improvements and audit the PPE Program annually.
- Hold a BCSP certification and/or an OSHA Construction 30 Hour Card and OSHA 500
  Certificate at a minimum, as well as attend professional development seminars and
  courses annually.
- Track safety performance of the company and maintain on an ongoing basis in a computer system and present the information in the safety committee.
- Maintain OSHA record keeping forms.
- Report directly to the upper management.
- Review the employee handbook on an annual basis and make any necessary changes.
- Translate all policies and procedures into the language of the workforce, when required.

## **EMERGENCY ACTION PLAN and FIRST AID**

## **PURPOSE**

The emergency action plan (EAP) designates safe assembly areas, emergency coordinators and procedures to follow in emergency situations. Compliance with this EAP is mandatory and is applicable to all employees.

## GENERAL REQUIREMENTS

This plan shall address the following information:

- Responsibilities
- Notification
- Evacuation Routes
- Assembly Points
- Communications
- Subcontractors

This plan shall be designed to anticipate the actions required by supervision and employees to minimize dangers to employees' safety and damage to physical equipment or property in the event of an emergency. Job specific EAP procedures and equipment are developed prior to the start of a project. All EAP procedures will be reviewed annually, and any necessary changes will be documented.

Types of hazards that normally would initiate an EAP:

- Fire & Explosion
- Release of hazardous gases, vapors, or fumes
- Significant chemical spill
- Severe Weather
- Flood
- Earthquake
- Major power outage
- Bomb threats, sabotage, and illegal activities
- Radiation emergencies
- Catastrophic or multiple employee injury

#### RESPONSIBILITIES

On construction projects a hazard analysis will be performed identifying those areas with potential for initiating the EAP, such as an evacuation, chemical spill and/or exposure. Each employee shall understand, know how to initiate, and follow the EAP when it is put into effect. During orientation, all personnel responsibilities will be thoroughly reviewed and discussed.

## **NOTIFICATION**

Different notification systems will be used on projects. Hi-Tech Electric Company will coordinate the method of notification with the owner, and when possible, use the same method, i.e. horn, siren, speaker system, etc. Contact information will be provided to employees who need additional information pertaining to the plan or to their respective duties. The corporate office shall be immediately notified when an emergency evacuation has taken place.

## ASSEMBLY POINTS

Each evacuation route shall terminate in an assembly area. This designated area shall be used to take a head count and assure that all employees have evacuated the danger area. No employee shall leave the designated assembly area without the direct permission of the senior company representative.

## **COMMUNICATIONS**

The methods and equipment for communication shall be established in such a manner as to include those emergencies where power outages may occur, as well as command line breakdowns. Personnel that have been issued portable radios shall be briefed in their use as part of the EAP.

## **SUBCONTRACTORS**

Hi-Tech Electric Company's representatives shall closely coordinate the EAP with other contractors, subcontractors, the owner, and personnel on the project to assure all are aware of the provisions, notifications, evacuation routes, assembly points, etc.

## SUPPLIES AND EQUIPMENT

- First aid supplies shall be easily accessible when required. Always follow the manufacturer's instructions when using the materials in the first aid kit.
- All Hi-Tech Electric Company's first aid kits contain appropriate items determined to be adequate for the environment in which they are used and if on a construction site, are stored in a weather-proof container with individual contents sealed by the manufacturer for each type of item. Hi-Tech Electric Company is responsible for ensuring the availability of adequate first aid supplies and to periodically reassess the availability for supplies and to adjust its inventories, and to ensure inspections are conducted on the first day of each week to verify availability and expirations dates.

- Where the eyes or body of any person may be exposed to injurious corrosive materials, a safety shower and/or eye wash (suitable facilities) or other suitable facilities shall be provided within the work area. Ensure expiration dates are checked and water used in storage devices is sanitized.
- An assessment of the material or materials used shall be performed to determine the type flushing/drenching equipment required. At client job sites, portable or temporary stations must be established prior to the use of corrosive materials.
- Based on the first responder's assessment of the injuries involved, decide whether the injured requires to be taken directly to a hospital's emergency room, occupational medicine provider or administer first aid on location.
- Examples of serious injuries that result in the injured PERSON being transported to a medical provider are those resulting in severe blood loss, possible permanent disfigurement, head trauma, spinal injuries, internal injuries and loss of consciousness. Keep in mind that the needs and wellbeing of the injured are the first priority.
- Proper equipment for prompt transportation of the injured person to a physician or hospital or a communication system for contacting necessary ambulance service shall be provided.
- Transportation needs must be preplanned and coordinated with the transportation provider prior to an incident requiring such service.

## **TRAINING**

Hi-Tech Electric Company, along with any subcontractors, will conduct a mock emergency drill to account for emergency procedures in the event of inclement weather, fire, electrical hazards, and any special event which could arise at a particular site. Emergency Actions Plans will be available to any employee upon request after the initial orientation has been completed.

Volunteers or selected employees are trained by the American Red Cross or equivalent in CPR and first aid. Each of these trained and certified employees are equipped with protective gloves and other required paraphernalia.

## JOB HAZARD ANALYSIS

## **PURPOSE**

Job Hazard Analysis (JHA) procedures provide a mechanism through which the information needed to anticipate, recognize, identify and evaluate job hazards can be obtained and called to management's attention. Jobs and activities are analyzed when an accident occurs and then reviewed. The information gained is utilized in the design and implementation of employee safety and environmental protection programs, as well as Corrective Action Plans.

## **SCOPE**

These work area hazard assessment guidelines apply to all Hi-Tech Electric Company divisions and field construction and maintenance projects. The outcome of the hazard assessments will be utilized in determining specific personal protective equipment requirements for employees.

## **POLICY**

This procedure will be implemented on an as-needed basis, where a thorough understanding of all work area hazards has not been established. All JHAs are conducted by the Safety Director or trained designee, both of whom have been trained in how JHAs are completed.

## REGULATIONS

Except to the extent that more explicit or more stringent requirements are written directly into these guidelines, the primary regulatory reference relating to employee protection and the performance of work area hazard assessment activities shall be Title 29 Code of Federal Regulations §1926.20, §1926.35 and §1910.38. These regulations, promulgated and enforced by the Occupational Safety and Health Administration (OSHA), are applicable to the work performed by Hi-Tech Electric Company.

## **PROCEDURE**

All employees and subcontractors are actively involved in the risk and hazard identification process. The risks and hazards are classified and ranked based on severity. Work area hazard assessment activities shall proceed in at least two distinct phases:

## JOB HAZARD ANALYSIS

JHAs are to be completed in the preliminary bid, during field changes, and on a set schedule to accommodate unforeseen field changes. Job hazard information can be obtained by two methods: the preliminary survey and investigative survey. JHAs are to be completed using Hi-Tech Electric Company's JHA form.

## PRELIMINARY SURVEY

Prior to bidding new jobs, the completion of a pre-job planning process is used to evaluate unique safety issues on the job. There should be as much data as possible collected from the facility/client personnel prior to any personnel deployment into the work area.

The preliminary survey relies heavily on information being provided by the facility operator/owner to the company. The preliminary survey is usually made with no equipment for measurement purposes, other than those portable pieces of equipment that can be conveniently carried on the person (such as a sound level meter).

## **INVESTIGATIONAL SURVEY**

Components of an investigational survey may include, but may not be limited to the following:

- Monitoring the air for IDLH and other conditions that may cause death or serious harm (combustible or explosive atmospheres, oxygen deficiency, and toxic substances),
- Monitoring for ionizing radiation,
- Visual observation for signs of actual or potential IDLH or other dangerous conditions,
- Monitoring welding operations for conditions of toxic metals exposure,
- Measurement of ventilation systems for both volume and velocity characteristics,
- Measurement of occupational noise exposure,
- Measurement of organic vapor concentrations during painting operations,
- Inspection and monitoring of asbestos-containing materials, and
- Measurement of organic solvent exposures during facility maintenance operations.

Some situations warrant special consideration:

- Any indication of IDLH hazards, or other dangerous conditions, should be regarded as a sign to proceed with care and deliberation.
- Extreme caution should be exercised in continuing the work area survey when such hazards are indicted.
- If IDLH or other dangerous conditions are not present, or if proper precautions can be taken, continue the survey.

## INFORMATION DOCUMENTATION

Proper documentation and document control are important for ensuring accurate communication, ensuring the quality of the data collected, and providing the rationale for safety decisions. Documentation can be accomplished by recording information on the Hazard Assessment Form pertinent to field activities, sample analysis, and work area conditions.

## **HAZARD ANALYSIS**

Once the presence and concentration of specific chemicals or classes of chemicals have been established, the hazards associated with these chemicals must be determined. This is done by referring to standard reference sources for data and guidelines on permissible levels of exposure, flammability, etc.

## **TRAINING**

- All employees will be trained in the job hazard analysis process.
- Hi-Tech Electric Company's representative shall train all job site supervisors and employees on the risk and hazard identification process.
- Retraining shall be provided for each employee, as necessary.

#### CONFINED SPACE PROGRAM

## **PURPOSE**

This procedure establishes safe practices for entering and working in confined spaces that may be hazardous to employees.

## **SCOPE**

This procedure applies to all operations involving Hi-Tech Electric Company.

## RESPONSIBILITY

When appropriate, Hi-Tech Electric Company will develop a written site-specific confined space procedure, complete training of all personnel required to work in confined space operations, and monitor and administer this procedure.

## INTRODUCTION

Confined spaces may contain many safety and health hazards. They may include but, are not limited to: asphyxiation (unconscious or lack of oxygen), falls, burns, engulfment, chemical exposure, job function.

The goal is to control confined space environments and prevent accidents that could lead to injury and death. If you have a question about a confined space, ask your supervisor.

Most fatalities and injuries occur because employees are unaware of the potential hazards in confined spaces. Confined space entry can present many health and safety hazards. Personnel must be properly equipped to handle these situations

OSHA considers any enclosed space in the workplace to be a confined space if it has 3 specific characteristics:

- 1. A size and shape that allows a person to enter body and perform assigned work.
- 2. Limited or restricted openings that could make it difficult for a person to enter and leave the space. Doorways that can be walked through are not considered to be limited openings since they would not prevent rapid evacuation or inhibit rescue operations.
- 3. Not designed for continuous human occupancy spaces entered infrequently or periodically for inspection, maintenance, cleaning or repair.

When an area in the workplace has all 3 of these characteristics present, it is considered a confined space, subject to regulation under the OSHA standard.

OSHA divides confined spaces into two classifications:

• Non-permit confined spaces: A confined space that meets the definition of a confined space, but does not meet the requirements for a permit-required confined space, as defined in this subpart.

•Permit-required confined spaces: A confined space that has one or more of the following characteristics:

Contains or has a potential to contain a hazardous atmosphere;

Contains a material that has the potential for engulfing an entrant;

Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section; or

Contains any other recognized serious safety or health hazard.

## SAFE ENTRY PROCEDURES AND PRACTICES

Entry may not be made until acceptable entry conditions exist.

Acceptable entry conditions exist when:

- Conditions are the same as those that must exist in a permit-space before entry is allowed.
- Atmospheric conditions are within acceptable ranges (ex. Oxygen).
- •19.5% 23.5%, LEL <10% and air contaminants are less than established permissible exposure limits.
- •Employees involved in the entry can safely enter, work within and exit the space.
- No activity outside the space will or has the potential to create hazards within the confined space.

Safe entry practices include:

- Isolating the permit space.
- Taking steps to eliminate or control atmospheric hazards.
- Protecting entrants from external hazards including but not limited to: pedestrians and vehicles.

Verifying that acceptable entry conditions are maintained throughout the duration of an authorized entry, work and exit.

## CONFINED SPACE ENTRY TEAM

Each permit-required confined space entry will have trained, competent personnel designated by Hi-Tech Electric Company as entrant(s), attendant and entry supervisor. Each employee who will have an active role in entry operations must be fully aware of his/her or her duties.

Authorized Attendant (Hole Watch): Person stationed outside of the confined space that monitors the authorized personnel inside. The authorized attendant responsibilities include:

Authorized Entry Supervisor: Person authorizing or in charge of confined space activities. The authorized entry supervisor responsibilities include:

Authorized Entrant: Person entering the confined space to complete job tasks. The authorized entrant responsibilities include:

## **TRAINING**

Training is required to ensure that all Hi-Tech Electric Company personnel assigned to work in confined space entry operations can safely perform their assigned duties and work safely within and around the permit space. Employees who must be trained in entry operations include: authorized entrants, attendants, entry supervisors and persons who test or monitor the atmosphere in a permit space.

## Training shall be:

- Provided to each affected employee.
- Prior to initial assignment to perform confined space work.
- Prior to change in assigned duties.
- Whenever there is a change in confined space operational procedures.
- When additional hazards are detected.
- •When an employee demonstrates a lack of understanding in the confined space procedures.
- Ensure all training is conducted in a language that can be understood by employees.
- Ensure subcontractors are also trained.

## **RECORDS**

A confined space permit indicating the expiration time and date of the permit must remain posted at the entrance to the confined space for the duration. A copy of this permit will remain in the project files for one year, or the duration of the project (whichever is longer), along with the completed copy and test results of the atmospheric testing for the confined space.

## LOCKOUT/TAGOUT PROGRAM

## **PURPOSE**

This procedure establishes minimum requirements for locking out and tagging switches, valves, circuit breakers, and other energy controlling devices when their unexpected energizing, start-up, or release of stored energy could cause harm to an employee or damage equipment or machines. It shall be used to ensure that the machine or equipment is isolated from all potentially hazardous energy.

## **SCOPE**

This procedure applies to all operations involving Hi-Tech Electric Company.

## **SUMMARY**

Accidents involving electrical, mechanical, and/or pressurized equipment and systems have occurred in the construction industry due to inadequate planning of the work or task to be performed, i.e., failure to lock and tag out equipment and systems.

Work performed on temporary electrical services and pressurized pipelines is equally as important from the standpoint of the use of the lockout/tagout procedure, as is permanent plant equipment and systems.

Lockout/Tagout (LOTO) is maintenance oriented and the key to the process of LOTO is the isolation of a machine's energy source so there is not a sudden, unexpected release of stored electrical, mechanical, hydraulic, pneumatic, chemical, thermal or other energy that could injure maintenance personnel and employees.

Lockout does not simply mean throwing the machine or equipment in the off position.

<u>Lock</u>: Placement of a lockout device on an energy-isolating device (i.e. power box lever) prevents operation.

<u>Tagout</u>: Form of communication warning employees not to energize the machine or equipment.

## RESPONSIBILITY

Only authorized employees who have received instruction and training on LOTO procedures can lockout a piece of equipment, and they are referred to as LOTO supervisors. All other employees receive affected personnel training.

## FORMS OF HAZARDOUS ENERGY

There are many different types of machinery and equipment used by the company. Prior to shutting down machinery or equipment, the authorized employee shall have knowledge of the type & magnitude of the energy, the hazards of the energy to be controlled, & the methods or means to control the energy. Energy comes in many forms and can exist in two states: active and stored. The following are examples of the different forms of hazardous energy:

- Electrical
- Compressed Air (Pneumatic)
- Petroleum Fuels (Fuel Lines)
- Gravity (Suspended Components)
- Hydraulic
- Tension
- Chemical
- Thermal (Surface Temperature)

## **AUTHORIZED EMPLOYEE**

The only employees authorized to lock or tag machinery and equipment and remove their locks and tags are personnel who have had specific LOTO training and are authorized by the company. Authorized employees have received information and training on energy sources and stored energy with machinery and equipment used by the company. Machinery and equipment will not be energized without the consent of an authorized employee. Unauthorized removal of locks or tags will be grounds for disciplinary action and/or grounds for termination.

#### AFFECTED EMPLOYEES

Affected employees are individuals who cannot use machines or equipment for production due to LOTO devices. If the machine, which you frequently use, is to be locked-out for maintenance or repair you will be verbally notified. Employees will also be notified if you typically use the products of the affected machine (i.e. materials cut to specific lengths). This will allow employees to make other arrangements for obtaining the materials you need to do your work and/or do projects that do not require the affected machine. Do not attempt to restart any machinery or equipment that is locked or tagged. When the machinery or equipment is ready for production, the LOTO supervisor will notify affected employees. Do not attempt to remove any energy-isolating device.

## INFORMATION AND TRAINING

All employees will be informed as to the procedures of the LOTO Program at the company upon assuming employment and will be updated during the term of their employment on any new equipment, new processes or new job assignment. Information and training topics include the program, responsibilities, how to recognize LOTO hazardous energy, isolation and control, and machinery and equipment lockout procedures.

Affected employees shall be informed of the specific purpose and use of the energy control procedure (LOTO).

Authorized employees shall receive adequate training by mastering the following topics: recognition of hazardous energy sources, types and magnitudes of energy available, and method and means necessary for energy isolation and control.

Retraining is required when there is a change in job assignments, in machines, a change in the energy control procedures, or a new hazard is introduced.

All training and/or retraining must be documented, signed & certified.

## HAZARD COMMUNICATION PROGRAM

## **POLICY**

To provide a hazard-free workplace, including a Hazard Communication Program to ensure the safety and health of all employees during the use, handling, and transfer of potential hazardous chemicals, in which exposure could cause illness and injury. A copy of this program and all SDS will be maintained on all jobsites & warehouse operations. This program is aligned with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS).

## RESPONSIBILITY

Management and the Hi-Tech Electric Company's Safety Director will be responsible for the administration and training of the Hazard Communication (also referred to as, HazCom) Program. This program may be used at times in conjunction with or as a reference point in other Hi-Tech Electric Company safety programs (i.e. Silica Dust). Hi-Tech Electric Company shall develop, implement, and maintain at each workplace, a written hazard communication program which addresses these elements: labels and other forms of warnings, safety data sheets, employee information and training.

## **SCOPE**

Compliance with this program is mandatory and is applicable to all employees. All employees will receive training and failure to comply with this program is grounds for disciplinary action and/or termination.

## "RIGHT TO KNOW" and "RIGHT TO UNDERSTAND"

A variety of laws, standards, and regulations are included in the term "right to know". As applied to the workplace, "right to know" pertains to the individual employees' right to receive information about the potential hazards of working with chemicals and substances in the workplace. This right is guaranteed to virtually all employees by two rules issued by the Federal Occupational Safety and Health Administration (OSHA). "Right to understand" comes from the GHS document (referred to as "the purple book") which presents an agreed upon hazard classification and labeling system to be utilized by majority of the world.

## INTRODUCTION

Chemicals play an important part in our personal lives and likewise are a necessary part of many workplace operations. Few workplaces exist where there is not some kind of potential exposure to chemical substances. The use of chemicals is required to complete work; for instance, solvents and lubricants are used to clean and maintain equipment, fuels are required to operate vehicles and other equipment, and fuel and gases are necessary to cut or melt materials.

The following written Hazard Communication Program (HCP) is in place for the personnel of

Hi-Tech Electric Company in order to comply with 29 CFR 1910.1200 and to assist the company in achieving our overall goal of a safer workplace. The purpose of the HCP is to ensure that the hazards of chemicals or other hazardous substances located in the workplace are evaluated and

that the information is transmitted to potentially exposed employees. A successful HCP will reduce potential incidents of illness and injuries as a result of hazardous substances.

## SAFETY DATA SHEETS

Safety Data Sheets (SDSs) are the keystone to a successful Hazard Communication Program. SDSs are designed to provide the necessary information needed to handle chemicals safely. Chemical manufacturers, importers, or distributors supplying the company with products are required by law to send SDSs with the first shipment.

A current copy of the Hazard Communication Program and the SDS binder will be maintained on each site in an accessible, centralized location which will be communicated to employees. SDSs are required for each hazardous chemical present. New chemicals will not be used until a SDS has been obtained.

## EMPLOYEE TRAINING AND INFORMATION

Before starting work, the trainers of new employees will go over their copy of the HCP and each SDS applicable to their job. Hi-Tech Electric Company will use a combination of handouts, videotapes, and classroom presentations to accomplish employee training.

Before any new chemical is used, all employees will be informed of its use, will be instructed on safe use, and will be trained on hazards associated with the new chemical. All employees will attend additional training, as appropriate, to review the HCP and SDSs. Appropriate library reference material will also be discussed during the training sessions.

The minimum orientation and training for a new employee is as follows:

- An overview of the requirements contained in the Hazard Communication Standard, 1910.1200.
- Hazardous substances are present in their workplace operations and this office.
- Location and availability of the written HCP.
- Physical and health effects of hazardous substances.
- Methods and observation techniques used to determine the presence or release of hazardous substances in the work area.
- How to lessen or prevent exposure to these hazardous substances through the use of control/work practices and personal protective equipment.
- Steps taken by the company to lessen or prevent exposure to the chemicals/substances listed on the inventory list.

Prior to a new hazard being introduced into any section of the workplace, each employee will be given information and training as outlined. After attending the training class, each employee will

sign a form to verify that they attended the training, that the written HCP was made available for review, and that he/she understands the HCP. If an employee has any questions about what protection they need, they will contact their supervisor immediately.

#### GENERAL SAFETY RULES

- 1. Management safety responsibilities are summarized for each job description. It is important for all employees to understand not only their responsibilities but also the responsibilities of fellow employees.
- 2. All supervisors and management will receive instruction and training on the company safety policies, procedures and programs.
- 3. Violations of safety policies result in disciplinary training. Disciplinary data will be used to modify employee training to further reduce safety infractions.
- 4. Should an injury or illness occur to one of the employees, Hi-Tech Electric Company promotes the practice of an expedited return to work program for those employees who are restricted in the performance of their regular job duties and tasks.
- 5. No employee will be allowed to return to work from work related injury/illness without a formal written statement by the authorized physician.
- 6. To provide a safe work environment, employees must be able to perform their job duties in a safe, secure, productive and effective manner, and remain able to do so through the entire time they are working.
- 7. Employees who are not fit for duty may present a safety hazard to themselves, to other employees, to Hi-Tech Electric Company, or to the public.
- 8. The use of alcohol and other drugs is prohibited while on the job and/or operating a company vehicle or equipment and can leads to unsafe working conditions for workers and the public.
- 9. Cell Phone use for personal reasons should be limited and conducted during breaks or on lunch. Employees whose job responsibilities require special, undivided attention are prohibited from using a cell phone.
- 10. Employees whose job responsibilities include driving are prohibited from using their cell phone while driving.
- 11. Job Hazard Analysis (JHA) will be conducted for the information needed to anticipate, recognize, identify and evaluate job hazards. Jobs and activities are also analyzed when an accident occurs, reviewed and then corrective actions taken.
- 12. Managers or supervisors will document and complete an accident or injury investigation in a written report and distribute appropriately. The manager or supervisor must submit the Accident & Injury Report Form to the safety director within 24 hours.
- 13. Report all accidents, regardless of the severity of the injury, to your manager or supervisor immediately. Injured employees should not transfer themselves to any medical facility. All incidents (including near misses) are investigated within 24 hours of occurrence.

- 14. Hi-Tech Electric Company reserves the right to have an injured employee complete a post-accident drug screening when there is reasonable cause of impairment.
- 15. When the injured individual returns to work, he or she must turn in all paperwork from the doctor and treatment facility to the manager or corresponding supervisor.
- 16. Hi-Tech Electric Company and any affiliated contractors will not tolerate any form of workplace violence, intimidation, or harassment on the job and/or in off-duty periods.
- 17. Managers and workers of Hi-Tech Electric Company have a responsibility to ensure that fatigue does not have an impact on the safety, health and well-being of themselves and others.
- 18. Operators of vehicles in use for company business shall follow all applicable federal, state and local motor vehicle regulations. This applies to all employees and non-employees who will be operating or riding in company owned vehicles that are to be utilized only during company hours and for company-associated operations.
- 19. All PPE issued shall be at no cost to the employee. Training on the proper use and fitting of PPE is provided.
- 20. Protective equipment, including PPE for eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields and barriers, shall be provided, used, and maintained in a sanitary and reliable condition wherever it is necessary by reason of hazards of processes or environment, chemical hazards, radiological hazards, or mechanical irritants encountered in a manner capable of causing injury or impairment in the function of any part of the body through absorption, inhalation or physical contact.
- 21. Compliance with this Bloodborne Pathogens Program is mandatory and all employees are responsible for reporting any exposure to blood or bodily fluids.
- 22. Housekeeping will be planned at the beginning of a job, during the job and will be carefully supervised and followed through to the final clean up.
- 23. Hazard Communication Program ensures the safety and health of all employees. A copy of this program and all SDS will be maintained on all jobsites and warehouse operations.
- 24. Fire extinguishers must be kept clean, accessible and inspected monthly and annually.
- 25. Wearing the appropriate personal protective equipment (PPE) in all electrical operations in accordance with OSHA standards and regulations. (29 CFR §1910 Subpart I and 29 CFR §1926 Subpart E)
- 26. All insulating PPE must be inspected before each day's use and immediately following any incident that can reasonably be suspected of having caused damage. Insulating gloves shall be given an air test, along with the inspection.
- 27. Lockout/Tagout (LOTO) is the process of LOTO is the isolation of energy sources so there is not a sudden, unexpected release of stored electrical, mechanical, hydraulic,

- pneumatic, chemical, thermal or other energy that could injure maintenance personnel and employees.
- 28. Only authorized employees who have received instruction and training on LOTO procedures can lock out a piece of equipment, and they are referred to as LOTO supervisors. All other employees receive affected personnel training.
- 29. In accordance with the scope of NFPA 70E, shock risk assessment will determine the voltage employees will be exposed to, the necessary boundary requirements, and PPE required to minimize the possibility of electric shock.
- 30. Do not, under any circumstances, move any crane boom, high-lift equipment or load line in the area surrounding any energized electrical power line.
- 31. All hand and power tools must be inspected prior to use for all guards in place and functioning in accordance with the manufacturer, damaged electrical or any other parts vital to safe use.
- 32. All damaged hand and power tools must be tagged "Out of Service" and taken out of service if any missing or damaged guards, cords, plugs, casing, etc. are present.
- 33. Fall protection is required whenever employees are potentially exposed to falls from heights that exceed applicable regulatory thresholds.
- 34. Fall protection equipment must meet the requirements of applicable ANSI, ASTM or OSHA requirements.
- 35. Anchorages used for attachment of personal fall arrest equipment shall be independent of any anchorage being used to support or suspend platforms and capable of supporting at least 5,000 pounds per employee attached.
- 36. A trained competent person oversees scaffold use, erection and dismantling. Daily scaffold inspections, prior to use, shall be performed under the direction of competent supervision. All defects shall be corrected at once or have defective tags attached.
- 37. Ladders shall be used only for the intended purpose for which they were designed.
- 38. Prior to use, selection of the proper size and design of the ladder must be calculated and considered. Ladders must be inspected prior to each use and monthly for deterioration and damage. No employee will be allowed to use, for any reason, any ladder that has broken, loose, or cracked rungs, side rails or braces. Any ladder found in this condition should be tagged, "Out of Service" and immediately removed from service.
- 39. Only an authorized operator who is trained and certified with the specific type of equipment shall be permitted to operate it. Operators shall be trained in the safe operation of each piece of heavy equipment they will be operating on the jobsite. This includes, but is not limited to boom lifts, scissor lifts, escalators, front loaders, trenchers, mobile cranes, fork trucks, etc.

- 40. All equipment must be inspected prior to use. This includes all company owned and rental equipment.
- 41. Before any excavation or trenching can begin, the estimated location of all utility installations must be determined such as sewer, telephone, fuel, electric, water or any other underground installations that might be encountered during excavation operations.
- 42. Protective systems are required when the depth of the excavation exceeds 5 feet or if the competent person determines a protective system is necessary based on the site, soil, or work conditions.
- 43. Whenever the possibility of falling into water exists, personnel shall be attired in a USCG approved Type III or Type V PFD or Life jacket.
- 44. Whenever a confined space entry is required, there must be a written and site-specific confined space procedure, complete training of all personnel required to work in confined space operations and must monitor and administer this procedure.
- 45. Prior to a confined space entry, all responsibilities will be determined and understood, such as is it a Permit Required or Non-Permit Required entry, who will be the Supervising Attendant, Attendant(s), Entrant(s), all appropriate rescue devices have been inspected and properly in place and all recue plans have been established.
- 46. All operators of welding and cutting equipment must be trained to operate the equipment that they will use. Appropriate safety procedures and PPE must be reviewed, understood and inspected prior to use.
- 47. Working in the heat and cold procedures must be in place to control the effects of environmental factors that can contribute to heat and cold-related illnesses.
- 48. All employees and contractors have the authority and obligation to stop any task or operation where concerns or questions regarding the control of HSE risk exist. No work will resume until all stop-work issues and concerns have been adequately addressed. No employees will be reprimanded for exercising their authority for issuing a Stop Work Intervention.
- 49. Prior to the start of a project, the Project Manager shall ensure that all health hazards related to refractory demolition have been identified and addressed in the pre-project phase.

# MEETING/TRAINING ATTENDANCE ROSTER

Company: Hi-Tech Electric Company	
Safety Meeting:	
Safety Training:	
Date:	
Time:	
Topics Addressed: new hire training, li confined space training	ft training, lock out tag out, fall protection, hot work and
Employees Signatures:	

# **Appendix - Forms**

- Acknowledgement Form
- Employee Application/Data Sheet
- Direct Deposit Form
- CBC Innovis Background Check Consent Form
- MI-W4
- FED W4
- Form I-9
- Employment Eligibility Verification Form
- New Hire/Employee Eligibility Form
- Authorization for Electronic Paystubs



# **ELECTRIC COMPANY**

Hi-Tech Electric

Address: 839 Lenox Ave Portage MI 49024

Phone: 269-323-1111

Date:

Confirmation of Receipt and Understanding of the Handbook

We are delighted to welcome you to the team at Hi-Tech Electric. As a new employee, it is important that you familiarize yourself with our company policies and procedures outlined in the employee handbook. This document serves as a confirmation of your receipt and understanding of the handbook's contents.

By signing this letter, you acknowledge that:

- 1. You have received a copy of the Hi-Tech Electric Employee Handbook
- 2. You understand that the employee handbook contains important information about the company's policies, procedures, and expectations regarding your employment.
- 3. You agree to read and familiarize yourself with the content of the employee handbook thoroughly.
- 4. You understand that it is your responsibility to comply with the policies and procedures outlined in the employee handbook, as they govern your employment with Hi-Tech Electric.
- 5. You are aware that any violation of the company policies and procedures may result in disciplinary action, up to and including termination of employment.

Please sign and return a copy of this letter to the Human Resources Department within one week to confirm your receipt and understanding of the handbook. Additionally, if you have any questions or require further clarification about any policy or procedure, please do not hesitate to reach out to your supervisor or the HR Department for assistance.

We are excited to have you join our team at Hi-Tech Electric, and we believe that together, we can achieve great things. Thank you for your prompt attention to this matter.

Confirmation of Receipt and Understanding	
I, , hereby acknowledge that I have received a copy of the Hi-Tech Electric Employee Handbook. I understand that it is my responsibility to read and familiarize myself with the contents of the handbook. I further acknowledge that I am bound by the policies and procedures outlined within the handbook, and any violation may result in disciplinary action, to and including termination of my employment.	ith
Employee's Signature: Date:	
[Please print this letter, sign and date it, and return a copy to the Human Resources Department	ıt.]