

Cushman & Wakefield Contractor Environment, Health & Safety Handbook

Better never settles



EHS
*Driving service excellence
that places people first*



Table of Contents

Table of Contents..... 1

1. Document Control..... 1

2. Revision History..... 1

3. Purpose..... 2

4. Our EHS Global Goals..... 2

5. Scope and Application..... 2

6. Definitions..... 3

7. General Conditions..... 3

8. Health & Safety..... 9

9. Environment..... 14

10. Appendix One..... 16

1. Document Control

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Approval records are available on the [Global EHS document repository](#)

2. Revision History

Revision Date	Revision no.	Author	Description of Changes
30/10/2024	1.0	Kenyon Brenish, Senior Managing Director – EHS, Matthew Garwood Global Head of EHS	Initial version
30/10/2024	2.0	Kenyon Brenish, Senior Managing Director – EHS, Matthew Garwood Global Head of EHS	Updated to refer to global policies.

3. Purpose

The purpose of Cushman & Wakefield (C&W's) Contractor Environment, Health & Safety (EHS) Handbook is to provide contractors with the necessary information to understand C&W's minimum safe work expectations when performing work on behalf of C&W either at our offices or our client facilities. This aligns with C&W's global goal to promote a safe working environment for C&W employees, contractors and others who may be affected by work activities.

This Handbook contains information about EHS policies, standards, practices and procedures, and defines the minimum level of conduct expected from Contractors while performing work for C&W on behalf of our clients in addition to the Contractor's obligation to comply with all applicable laws, regulations, standards and contractual obligations while performing work for C&W and/or our clients.

Contractors are responsible for controlling workplace activities to prevent adverse risk or incidents to those involved or affected by the work performed for C&W.

Work performed in a manner that endangers life, the environment or property is unacceptable and may result in disciplinary actions for both individuals and organisations. It should be noted that all of the rules, requirements and clauses specified in this document must be considered in the context of and applied as is deemed relevant to conducting the 'Work'.

4. Our EHS Global Goals

We never settle for the world that's been built, but relentlessly drive forward, using our EHS model to achieve ambitious EHS goals that represent our vision of the future:



Maximizing Our Productivity

We understand that our organization is a commercial operation and by developing proactive EHS *leadership* we can support business growth while also protecting our people, our communities and our planet.



Enhancing Our Brand

We actively contribute to the enhancement of our corporate brand and reputation through the development and deployment of effective EHS management *systems* which ensure regulatory compliance, mitigate risks and foster service excellence.



Preventing Harm

We recognize that a successful business is one that strives to prevent harm and that nurtures a *culture* that is supportive of the safety and health of our employees, our supplier partners, members of the public and the environment.

5. Scope and Application

The provisions of this Handbook apply to all Contractors working at all C&W owned or leased sites as well as Contractors delivering work on behalf of C&W at our clients' premises. The requirements set forth in the Handbook also apply to the Contractor's subcontractors, consultants, and agents and their personnel.

Individual C&W sites and those of our client(s) may have additional specific environmental, health, safety, and security rules, practices and procedures that apply when the Contractor performs work on that site. Contractors are responsible for following such rules, practices and procedures applicable to that site.

The provisions within this handbook apply globally. Where additional local documentation applies to the work instructed this will be referenced as required within **Appendix One**.

This Handbook does not replace or supersede local legal requirements or the Contractor's own environmental, health, safety and security training and policies and procedures and specific contract terms and conditions but should be read and understood alongside these other requirements. C&W expects Contractors to communicate their own policies, as well as those contained in this Handbook, to all of its employees and subcontractors who perform work for C&W and / or our clients, including translating any and all requirements to any employees or subcontractors who do not speak or read English.

6. Definitions

Define key terms and acronyms used in this document.

Term	Definition
'Client'	means any company for which C&W has been appointed to represent, and has the authority to act on its behalf, with regard to the <i>Work</i> .
'Site'	means any premises, property or construction site which is either owned or under the control of the Company, and where the <i>Work</i> is to be carried out.
'Company'	means C&W, or any associated group company or entity
'Contractor'	means any other company, or any employee, representative or agent of that company, who is appointed to undertake <i>Work</i> on behalf of C&W or is appointed by C&W to operate on behalf of its Client. For the purpose of this document, and for the avoidance of doubt, the term 'contractor' will include; consultants, surveyors, designers, project managers, contractors as applicable. Duties applied to Contractors will also apply equally to any sub-contractors employed by the Contractor.
'Company Representative'	relates to any representative of the Company authorised to place contracts, give instructions to the contractor, or permit the Contractor to carry out work. This would also relate to any person authorised by the Company to make decisions and provide authorizations on its behalf.
'Work'	the work or works to be carried out by the Contractor in relation to a specific contract or instruction. 'Work' will include both construction works and non-construction related works.

7. General Conditions

7.1. Compliance

It is the expressed responsibility of the Contractor to ensure, all their workforce and any appointed sub-contractors comply fully with all relevant and applicable legislation, regulations, official guidance, standards and recognised industry guidance. In addition this obligation extends to compliance with Cushman & Wakefield's specific vendor policies including the corporate values, standards and practices outlined in our Global Code of Business Conduct, Global Environment Policy, Global Health and Safety Policy and Global Vendor/Supplier Integrity Policy. All these policies are available upon request.

In particular, the Contractor is reminded of its obligations to provide and maintain safe plant, tools, equipment and systems of work for its employees. This obligation extends to the use, handling, storage and transport of articles and substances and the need to provide such information, training, supervision and instruction to its employees as will ensure so far as is reasonably practicable their health and safety at work. All operatives must be fully competent to deliver assigned tasks on the work site including the design of any works.

The Contractor shall also ensure all their adopted work practices are risk assessed to ensure that proposed controls to ensure health & safety (and prevent environmental damage) are suitable and sufficient (and remain so for the duration of the prescribed works) for the tasks which they have been appointed to undertake. The Contractor must aim to eliminate risks in relation to their work, and where this cannot be achieved, minimise risks as far as reasonably practicable.

The Contractor will also ensure that all adopted work practices do not cause a potentially hazardous working environment to others who may be affected by their activities. This should also include evaluating the interaction of any Company and / or Client policies or procedures that may also be operational at the time of the prescribed works.

If the Contractor (or their employees/ sub-contractors) are in anyway unclear on any part of the above, or any other sections of this document, they must not commence work until such time as they are confident they can comply in its entirety.

If any part of this document is unclear; clarification must be sought from the Company Representative before any works (associated or direct) can commence.

7.1.1. Insurance

The Contractor must have in place and maintain adequate levels of Insurance cover, in accordance with the requirements set out in the contract issued for the Work and local legislation. Where the Contractor is providing advice in a professional capacity suitable and sufficient Professional Indemnity cover must also be in place.

7.1.2. Regulatory Agency Inspections

Contractors must immediately notify the C&W Company Representative should any regulatory agency inspectors or compliance personnel request or demand information or entry to any work site.

It is C&W's policy to accompany representatives of regulatory agencies, and contractors will request that any inspection does not begin until a Company Representative or other designated C&W representative is present.

7.1.3. C&W EHS Management System Requirements

C&W's EHS Management Systems are the set processes and procedures that C&W uses to identify, track, and reduce environmental, security, health and safety impacts and risks. The Contractor will:

- Understand the EHS aspects, impacts, and operational controls related to its work activities and the work areas and equipment under its control or influence.
- Prepare and submit Risk Assessments, Safe Work Method Statements, Job Safety Analysis (JSA's) or Site Safety Plans as required by the C&W Company Representative
- Implement, monitor and maintain operational controls, as necessary, to comply with C&W EHS Standards, applicable laws and regulations and other requirements, and to minimize the EHS risks and impacts.

7.1.4. Safe Systems of Work

Where a 'Safe System of Work' is required, the Contractor must ensure that a documented copy is forwarded to the Company Representative for review before the Work is commenced. Copies of these documents are to be held on the Site and made available for inspection at all times during the Work. The Contractor will ensure that suitable and sufficient risk assessments are carried out for all activities associated with the Work safe system of work. The risk assessments must be comprehensive, be specific to the type and location of work being undertaken and include details of measures to be taken to control risks.

A precautionary approach must be taken and the principles of prevention must be applied when formulating any work method and risk assessment. The Contractor is also to advise the Company Representative of any significant findings from their risk assessments where a risk to the Company or other Site personnel, property, equipment or process is identified.

Where necessary the safe system of work and risk assessment must be dynamic and easily adaptable to suit changing work conditions or findings. For example, emergency works may be unpredictable and site operatives should have the capability to perform dynamic risk assessments to protect themselves against dynamic hazards. Any changes to the safe system of work or risk assessment(s) must be appropriately recorded and effectively communicated to those undertaking the Work. Contractor operatives must be competent in dynamic risk assessment.

Contractor managers/supervisors must ensure regular EHS briefings and toolbox talks are provided to workers to ensure they are familiar with the work to be done and any hazard mitigations.

7.1.5. Licenses, Certifications and Permits

Contractors must have the appropriate skills, professional licenses and certifications required for the work being performed (e.g. electricians, HVAC technicians, hazardous waste handlers, etc.) Permits required for equipment or work performed must be obtained per site and legal requirements and as designated in the contract or agreement. All permits (e.g. hot work permits, permits to work, etc.), certificates of inspections, and licenses are to be kept current.

Where the Contractor is required to operate their own permit to work system the following additional controls must be adhered to:

- All persons who issue permits to work must be competent and trained to do so,
- The permit to work must be issued by a responsible person, not directly involved with the activities covered by the permit,
- The permit to work will identify all relevant safety precautions applicable to the work,
- The extent and timings of the activities must be clearly stated,
- Appropriate monitoring must be undertaken to ensure that the permit is being followed correctly,
- Copies of all issued permits to work must be available for inspection by the Company Representative.

All permits must be effectively closed at the end of the work and may be requested by the Company Representative for their records.

7.1.6. Sub-Contracting

No work will be sub-contracted without the written permission of the Company Representative. The Contractor will be responsible for ensuring that any sub-contractor they appoint is competent to carry out the work effectively and safely. It will also ensure that a formal vetting process has been undertaken to determine that the sub-contractor has appropriate policies and procedures in place, prior to appointment.

The Contractor will be required to operate and manage an effective work authorisation process for all relevant work undertaken by any sub-contractor under their control.

The Contractor will be responsible for supervising the work of their sub-contractors and ensuring that they are inducted to the Site rules and provided with any relevant information affecting the safety of the work. The Contractor will be responsible for monitoring the health and safety performance of its sub-contractors and taking appropriate action to resolve any corrective actions identified.

The Contractor will be responsible for ensuring that all persons under its control, including any subcontractors engaged by the Contractor, are working in accordance with any such rules as may apply to the Site. In particular, the Contractor will ensure:

- Adherence to agreed safe systems of work,
- Appropriate personal protective equipment and clothing is issued and that it is used,
- No smoking rules are strictly enforced,
- Communication is in a language understood by all workers on site,
- All accidents are reported to the Company and an internal report is completed.

7.1.7. Supervision

The Contractor must ensure that all activities and persons under their control or instruction are adequately and competently supervised. Persons undertaking supervisory duties must have the necessary skills, knowledge and experience to fulfil their duties.

7.1.8. Co-operation and Co-ordination

The Contractor must cooperate and coordinate their work activities with others working on site so that the risks to themselves and to others affected by the work are managed effectively. Where necessary the Contractor must share information related to risks that may affect others working on site and take action to ensure that risks can be effectively controlled before starting work.

7.2. General Requirements

7.2.1. Incident Prevention

Any hazard that becomes apparent at the Site, which is not under the control of the Contractor, must be immediately reported to the Company Representative for action, as necessary. All other hazards, which are under the control of the Contractor, must be effectively controlled to prevent incidents, so far, as is reasonably practicable.

7.2.2. Injury, Illness, Incident and Near Miss Reporting

In addition to the Contractor's own procedures; in the event of an injury, illness or dangerous incident / near miss taking place the Contractor must ensure that this is reported to the C&W Company Representative. Significant incidents including fatalities, major injuries or any significant dangerous occurrence or near miss incident must be reported directly to the C&W Company Representative by phone immediately.

The Contractor is reminded of his obligations to report, without delay, any serious injuries, or dangerous occurrences to any relevant enforcing authority as required under local legislation.

Any incident that results (or may result) in significant environmental damage must also be reported to the C&W Company Representative immediately. Environmental incidents include (but are not limited to): significant spillage of fuels/oils/chemicals, discovery of suspected asbestos, refrigerant leaks, damage to wildlife or ecological habitat.

Contractors must thoroughly and promptly investigate all significant or potentially significant incidents and identify corrective actions to correct workplace hazards and prevent a recurrence. Contractors must implement corrective actions in a timely manner to address EHS deficiencies identified in incident investigations and / or audits and inspections.

Where requested, Contractors are required to actively participate in C&W and/or client incident investigations.

7.2.3. First Aid and Medical Emergencies

Contractors must ensure relevant health checks are carried out on their workforce to they are deemed fit for the relevant role / activity. Contractors are responsible for providing first aid, transportation, and emergency medical services for their employees. Contractors must provide their own trained first aid responders, first aid supplies, and equipment for their work teams.

Some Client sites have internal emergency response teams who may assist the Contractor in responding to serious or life-threatening medical emergencies. However, this does not eliminate the Contractor's responsibility to provide emergency medical service capabilities for their employees.

Contact the C&W Company Representative for additional site-specific information and requirements.

7.2.4. Emergency Reporting

The Contractor will follow the established site procedure to report a site emergency (medical emergency, chemical spill, fire or another emergency). This may involve calling the site emergency number from any internal Client phone, or where there is no site emergency number, directly notifying public emergency response personnel. In all cases, the Contractor will also immediately notify the site's C&W Company Representative.

7.2.5. Emergency Response

Contractors must be familiar with the evacuation procedures, alarms, routes and assembly and staging areas for work locations and participate in emergency drills. When a building alarm, the public address system, or verbal notification to evacuate is given, all individuals MUST evacuate immediately. Evacuees must remain in assembly areas until the all-clear signal is given to return to the site. If the Contractor has information relating to the cause or nature of the emergency, the Contractor will notify Security and the C&W Company Representative.

Contact the C&W Company Representative for additional site-specific information and requirements.

7.2.6. EHS and Security Orientation

All Contractors are required to review this Contractor EHS Handbook and to attend C&W and Client sponsored Facility/Property pre-assignment orientation to become familiar with general and site-specific C&W policies and procedures. Contractor representatives attending orientations have the responsibility for passing orientation information on to workers, subcontractors, and others working directly under their control.

Depending on the nature of the Contractor services, orientation sessions may be conducted on a site or Facility/Property basis, before work commences.

7.2.7. Visitors

Contractors are prohibited from escorting visitors onto C&W or Client property unless approved in advance by an authorized C&W Company Representative. Visitors and authorized contractors must always be escorted. Contractors must provide visitors with any required PPE before they enter any work area as well as an appropriate EHS orientation as is required. Visitors must follow any reasonable direction provided by the C&W Company Representative.

7.2.8. Smoking / Vaping

C&W has a NO SMOKING / VAPING policy inside facilities and construction sites. Smoking or Vaping is only permitted in designated outdoor "Smoking Areas" or specially designed and maintained indoor "Smoking Rooms" and in accordance with any client rules.

7.2.9. Welfare

Contractors must ensure that correct and authorized site welfare facilities are used at all times. Welfare facilities must be kept clean and tidy. Issues with welfare facilities must be reported to a C&W representative.

7.2.10. Housekeeping

The Contractor must ensure the safe delivery, unloading, hoisting and storage of materials, in accordance with Site instructions or those provided by the Company Representative. All materials must be stored suitably and safely to prevent injury e.g. due to materials falls / collapse. At no time should the Contractor impede or endanger normal access to areas outside the immediate area of the Work. This applies in particular to designated access egress points and emergency escape routes and exits. Access to emergency equipment must always be maintained. Contractors must not move or relocate emergency equipment without written approval of the Company Representative.

The Contractor must ensure that while working at the site that the area of work is maintained in a clean and safe condition, such that no person is put at risk of injury, illness or incident. Particular care must be taken when storing items externally to prevent items being moved, damaged or lifted during adverse weather conditions.

7.2.11. Training

Contractors are required to provide EHS training and information for all Contractor personnel working on behalf of C&W or our clients at the time of job assignment. The training must include a review of safety and environmental procedures and all topics required by applicable regulations and other requirements. C&W may review the Contractor's EHS training records at any time.

7.2.12. Equipment, Vehicles, and Personal Protective Equipment (PPE)

Contractors must provide their own tools, equipment and vehicles, including PPE and other safety related items needed for their work on a Client Site.

Contractors are responsible for the maintenance, testing, certification and safe operation of tools, equipment or vehicles. Tools, equipment and vehicles will be used or operated only by persons who are appropriately trained and qualified (including any necessary licenses) to operate such tools, equipment or vehicles.

Contractor's tools, equipment and vehicles must be properly calibrated, inspected, tested and maintained in accordance with standard industrial practice, legal requirements and manufacturer's directions. Tools and equipment used on site must not be modified unless the modification is approved by the manufacturer.

Personal Protective Equipment (PPE) including but not limited to safety respiratory, head, eye, hearing, hand or foot protection must be supplied by the contractor to those persons performing the work in accordance with the safety requirements for the work. Workers are to be trained and instructed in the correct selection and safe use of the equipment. The equipment / clothing worn must be determined through suitable and sufficient risk assessment and / or through adherence to best practice guidance. PPE must be appropriately stored and maintained and damaged PPE must be responsibly discarded.

C&W has no responsibility for the security of, or loss or damage to, any of Contractor's tools, equipment or vehicles used in connection with contracted services. In addition, C&W is not responsible for safeguarding, replacing or repairing lost, stolen, or damaged personal property in connection with the work.

7.2.13. C&W Owned and Leased Tools and Equipment:

Unless specifically authorized in writing in the contract or by an authorized C&W Company Representative, use of C&W-owned or leased tools or equipment (or those of our client(s)) by a Contractor or any other non-C&W employee is prohibited.

7.2.14. New Equipment Purchases

Prior to purchasing or installing any new equipment on behalf of C&W for use in Client operations, or for any other reason, Contractors must obtain written approval from an authorized Company Representative. Inspections of new equipment are required to ensure compliance with the contract, legal requirements, and C&W EHS requirements. Contact C&W Company Representative for the site-specific approval process.

7.2.15. Parking and Traffic

Contractors must observe and obey all site parking and traffic rules including posted speed limits. Violations will be reported to the Company Representative and improperly parked vehicles may be cited or towed at the owner's expense. Specific parking areas may be designated for Contractor use by arrangement with the Company Representative and will be marked accordingly.

Work sites operated by the Contractor must be organized in such a way that pedestrians and vehicles can move without risks to health or safety. Designated safe pedestrian routes must be established with clear physical segregation between pedestrians and vehicles/machinery. Machinery and vehicle reversing must be planned & safely managed by competent personnel. Traffic routes must be suitable for the persons or vehicles using them, sufficient in number, in suitable positions and of sufficient size. In relation to traffic routes the contractor must ensure that suitable and sufficient steps are taken to ensure that pedestrians or vehicles may use it without causing danger to the health or safety of persons near it. The Contractor must ensure that each traffic route is;

- (a) indicated by suitable signs where necessary for reasons of health or safety;
- (b) regularly checked; and
- (c) properly maintained.

No vehicle is to be driven on a traffic route unless that traffic route is free from obstruction and permits sufficient clearance.

7.3. Security Requirements

7.3.1. Work Site Security

Contractors must conform to site-specific requirements for maintaining the work site boundary's integrity. Suitable measures must be in place to prevent unauthorized access to site premises and permanent and temporary structures e.g. scaffolding. All barriers and hoardings must be erected according to the temporary works design/manufacture's instructions. Regular checks on the site boundary/fence/hoarding must be carried out and recorded. Any damage to the boundary must be rectified. Where necessary suitable out of hours monitoring measures such as CCTV and security patrols must be implemented. Open floor voids, unprotected leading edges, open drainage pipes must be protected in order to prevent unauthorized access. Machinery/equipment/tools must be isolated when not in use and stored securely to prevent unauthorized access and misuse.

Contractors must ensure appropriate measures are in place where work is carried out adjacent to the public realm. Suitable robust barriers with signage must be in place to prevent unauthorized access. Consider measures to prevent unauthorized access to the work area by children and other vulnerable road/footpath users such as wheelchair users and cyclists.

7.3.2. Identification Badges

Contractors must wear identification badges at or above the waist and below the neck all times while on the premises where this is a requirement. Badges must not be loaned to others, altered, or defaced. Contractors will be provided unescorted access only to the areas within the work area that need to be accessed based on the work being undertaken.

Contractors attempting to enter a C&W or Client Facility/Property without proper authorization and ID will be immediately reported to Security, questioned about their presence and may be asked to leave the Site. 'Out of hours' access to the Site, such as evenings, weekends and public holidays, will have to be arranged and agreed with the Company Representative. The contractor must ensure that they implement their own safety procedures for lone working where these are required and that these are documented within the work risk assessment.

7.3.3. Inspection of Contractor Property

The Contractor will hold full responsibility for the care of the Work, generally until its completion including site security. This will apply to: all Work executed; the deposition and storage of materials relating to the Works; together with all risks arising from weather, carelessness of operators, damage, or loss by theft or any other cause. The Contractor will also be required to ensure that the Site remains secure at all times and must comply with any specific requirements for the Site. C&W and our Client(s) reserve the right, to inspect Contractor's property, including personal property, while on C&W/Client premises. Vehicles parked or operated on site are subject to search without prior notice.

Contractors assigned to work on behalf of C&W or our Client(s) are expected to abide by all relevant C&W and/or client security policies, standards, programs and procedures during the work. Neither C&W nor our Client(s) is responsible for protection of, loss of or damage to Contractor property.

7.3.4. Completion of a Contract Company's Work Assignment

Upon completion or termination of Contractor's work assignment:

- All Client identification badges and Facility/Property access devices (card keys, keys, etc.) will be immediately collected from the Contractor and returned to the Company /Client Representative.
- Contractor will immediately notify the Company Representative of any issues known to the Contractor that could present an increased risk or threat to C&W or our client(s).

7.3.5. Reassignment of Workers

Contractors, whose assignment ended as a result of involuntary termination for misconduct of any kind, are not permitted to work at any other C&W or Client site.

7.3.6. Security Reporting

Actions and behaviors that are contrary to C&W's policies for providing a safe, secure, work environment will not be tolerated and must be immediately reported to the Company Representative. Examples of behaviors that may be considered to be unacceptable include, but are not limited to:

- Harassment of any kind
- Property theft or damage
- Disorderly, violent, or threatening conduct
- Misuse or unauthorized use of Client property
- Criminal activities
- Being under the influence of alcohol or drugs while on the work site, or during the performance of a work assignment, excluding prescription drugs prescribed by the contractor's physician and consumed in accordance with the physician's instructions.
- Possession of dangerous weapons, explosives, firearms, unauthorized chemicals, or similar items.
- Unauthorized access into restricted areas or places which are not part of the work area.
- Violation of C&W or Client sensitive information policies
- Any activity or behavior that presents an increased risk to site employees

8. Health & Safety

8.1.1. Electrical Safety

Contractors undertaking electrical work must establish and maintain an effective electrical safety program. Contractors working on or near energized conductors or parts must be qualified to perform such work. Energized parts, circuits, panels, junctions, or other equipment must be properly guarded and posted; unguarded, energized parts must never be left unattended. Breakers and disconnects must be labeled to indicate the circuits or equipment that they serve. All electrical devices and tools must be properly grounded or double insulated. All portable apparatus and tools must be properly maintained and where necessary tested. Faulty electrical equipment / cables must be removed from site. The Contractor is responsible for ensuring that good working practices are applied in respect of the provision and use of electrical equipment. Evidence of electrical testing may be required.

Work on circuits and equipment of voltages at or above 240V may require a Permit-to-Work and suitable locking off and tagging out procedures in accordance with the safe system of work. If working with High Voltage (HV) electrical equipment the Contractor must ensure appropriate compliance with any statutory regulations or best practice guidance covering the operation and maintenance of electrical switchgear. High voltage safety procedures must be documented and followed when working with high voltage sources, such as transformers, disconnects, motor control panels, etc.

8.1.2. Lockout/Tagout (LOTO)

Contractors must have a documented hazardous energy control program in place (Lockout/Tagout) before doing electrical work or working on equipment with other sources of potentially hazardous energy (hydraulic, pneumatic, chemical, mechanical, etc.). Program materials must be made available to C&W upon request.

Site/equipment-specific lockout and/or tagout must be implemented when performing maintenance or repair work on equipment or machinery to prevent unexpected start-up or release of stored energy that may cause injury. Operation of a valve or switch with danger tags attached, or removal of a lock(s) without authorization will result in removal of the Contractor from the site.

8.1.3. Fire Safety

When responsible for the management of a work site the Contractor must take special precautions in relation to fire safety due to the temporary and changing nature of any site. Where necessary, suitable and sufficient fire-fighting equipment and fire detection and alarm systems must be provided and located in suitable places. Fire-fighting equipment or fire detection and alarm systems must be examined and tested at suitable intervals and properly maintained. Fire-fighting equipment which is not designed to come into use automatically must be easily accessible. Where appropriate, the provisions put in place must be determined through the completion of a thorough risk assessment. The Contractor must ensure that each person at work on a work site must be instructed in the correct use of fire-fighting equipment which it may be necessary for the person to use. Fire-fighting equipment and escape routes must be indicated by suitable signage and where necessary emergency lighting must be provided. Operatives must be inducted into emergency procedures with drills undertaken at suitable intervals. Sources of ignition must not be left unattended. Before leaving the work site Contractors will ensure that naked flames and other ignition sources have been extinguished and non-essential electrical apparatus switched off.

8.1.4. Welding, Cutting, and Burning (Hot Work)

Contractors must consider off-site fabrication methods if possible. Welding and brazing activities on site must be carefully planned and only carried out by trained competent personnel. Contractors must follow site-specific procedures for welding, cutting and burning, brazing, grinding, soldering and other types of hot work including the requirement to obtain a Hot Work Permit as required. Ventilation equipment must be used where works take place in restricted spaces such as basements and plant rooms. Using LPG / propane gas as a fuel gas (which is heavier than air) must not be used in risers or confined spaces where it can fall to a lower level and cause a serious risk to others.

Contractor employees must be trained on all aspects of the hot work permit system and the hazards and precautions for the work performed. If hot work is to be done inside an occupied building, the work must be planned to minimize occupants' exposure to fumes and other potential hazards. Special precautions must be taken to prevent interference with area gas, sprinkler and smoke detection equipment. Combustible materials in the work area must be removed and/or suitably protected prior to the hot work commencing.

A fire watch must always be provided while hot work is being performed. The Contractor performing the work will provide relevant fire protection and personal protective equipment. The Contractor must work with the C&W Company Representative to coordinate with other employers in the work area to identify any known potential hazards. Fire extinguishers of appropriate type and capacity must be available during performance of all hot work and personnel assigned to fire watch trained in the proper use of fire extinguishers.

Upon completion of the work post-work fire watch may be required in accordance with the permit requirements.

8.1.5. Fire Protection and Life Safety System Maintenance and Impairment

Maintenance and testing of fire protection and life safety systems must comply with all local code requirements. Contractors must contact the C&W Company Representative and follow the applicable permit and approval system before working on or engaging in activities necessitating system shutdowns that could damage or impair fire suppression and protection systems.

Operations that create dust, mist, fumes, or particles, such as sanding and spray painting, may affect smoke detection and fire alarm systems, and must be approved in advance by the C&W Company Representative.

8.1.6. Gas Safety

All compressed gas cylinders (oxygen, acetylene, nitrogen, argon, etc.) must be properly secured in an upright position for both storage and use. Cylinders not in use shall be capped. Acetylene and oxygen cylinders mounted and secured to portable cart assemblies and intended for frequent use need not be capped when stored in approved locations between applications.

Gas cylinders may not be stored inside office areas. When not in use, all cylinders must be properly secured and stored only in authorized, controlled access areas. Valve caps must be kept in place when cylinders are not in use. A proper hand truck must be used to move cylinders.

- Do not drag or roll cylinders.
- Do not drop or bang cylinders together.

If any part of the Work involves the installation, maintenance or modification of any gas systems, the Contractor must ensure that any persons undertaking these activities are suitably competent, in accordance with all relevant local legislative requirements. Evidence of competency and training may be requested at any time. The contractor must maintain appropriate records of maintenance of all gas systems maintained on Site.

8.1.7. Construction and Work Areas

Work areas must be properly barricaded and marked. Contractors will be responsible for providing all safety signs, cones or taping, barricades, guardrails, partitions, fences or signal persons as required to isolate the Contractor's work area from pedestrian traffic or to maintain use of the area, and to prevent unauthorized access to areas where employees or others may be endangered.

Appropriate warnings and instructional safety signs must be conspicuously posted. Contractor plans to impede exits or exit routes and assembly areas must include alternate exit plans and must be reviewed and approved by an authorized Company Representative before beginning work. Contractors must remove all signs and barricades at the completion of the work, or when the potential hazard no longer exists.

An authorized Company Representative must approve construction activities involving drilling or cutting into building structural components.

8.1.8. Confined Space Entry

Contractors must avoid confined space entry if possible. Modify the confined space so that entry is not necessary or work from outside with suitable safe engineering methods. Contractors are prohibited from entering a permit-required confined space unless a documented confined space entry program has been implemented, that includes: procedures, Contractor employee training, Confined Space Entry Permits, applicable work permits, atmospheric monitoring, mechanical ventilation, standby personnel and rescue procedures and equipment.

C&W will provide Contractors with pertinent information regarding known hazards in C&W confined spaces where this is available. Contractors must submit work plans and Confined Space Entry Permits to an authorised Company Representative before beginning work.

Construction activities that create a new confined space must be reported to the C&W Company Representative. Contractors must provide their own safety equipment including PPE, monitoring and rescue equipment and procedures.

8.1.9. Industrial Powered Vehicles

All Contractors operating industrial powered vehicles must be trained and licensed or certified in the operation of the equipment to be used. Contractors are not allowed to use C&W or client owned or leased industrial powered vehicles unless approved by an authorised Company Representative.

Documented inspection and maintenance reports must be made available for review by an Company Representative upon request. An authorized Company representative must approve the use of internal combustion engine equipment for indoor use.

8.1.10. General Working at Heights

A place is deemed to be 'at height' if a person could be injured falling from it, even if it is at or below ground level. All activities where a person may be injured from a fall from height must be subject to a safe system of work. The contractor must follow these standards as a minimum (this list should not be seen as exhaustive):

- All contractors and sub-contractors must comply fully with the requirements of local legislation and regulation pertaining to work at height as well as any other associated codes of practice or guidance,
- All work at height is to be properly planned, supervised and organized. This must include making provision for emergencies and rescue. Operatives must be trained in work at height rescue if rescue measures are required.
- Work at height must be avoided wherever possible. Where work at height cannot be avoided an appropriate risk assessment and safe system of work must be put in place and followed. Suitable work equipment and other measures to prevent falls must be provided,
- The safe system of work and risk assessment must identify appropriate controls to reduce risks from work at height activities.
- All employees of the contractor or any sub-contractor, involved in work at height, must be trained and competent in managing risks from such activities and undertaking safe work at height,
- The place where the work at height is to be carried out must be safe and the risks from fragile surfaces and unprotected edges must be properly controlled. The risk from falling objects are also to be properly controlled,
- All equipment used by the contractor for work at height must be appropriately serviced, maintained and inspected before use, and any applicable statutory tests must be in date. No equipment belonging to the Site, the Company, the Client or other occupiers of the Site must be used by the contractor without express authorisation of the Company Representative
- Collective fall prevention methods (edge protection) must be implemented if working at height is required routinely. Personal fall prevention measures (lifeline / safety harness) are only to be introduced to protect individuals from falling where collective prevention methods are not practicable or the work is short term.

All Contractors undertaking rope access work on C&W Sites must follow relevant local best practice guidance in relation to rope access works. Rope access activities can only be used when other, more appropriate means of access (using collective control methods) cannot be reasonably used. All rope access operatives must be appropriately competent and must be appropriately supervised.

8.1.11. Fall Protection

Contractors must utilize fall prevention and, as a last resort, protection measures and equipment compatible with the work being performed, as required by local law or regulation. Where work is performed at heights, occupied areas, walkways and roadways must be cordoned off. Contractors must evaluate fall hazards and provide appropriate training and protection.

8.1.12. Ladders

The Contractor must provide ladders for use by Contractor employees. Contractors will not use C&W and / or client ladders. Ladders must be of the appropriate height, service/duty rating and type (e.g. non-conductive for electrical work) for the work performed and maintained in good condition. Defective ladders must be immediately removed from the work site.

All Contractors' ladders must be labeled with the Contractor's name and last date of inspection. Ladders must be inspected prior to each and every use. Contractors must ensure step ladders are used by trained competent personnel only. Ladders must be positioned on a firm and level base and users must maintain 3 points of contact at all times. Ladders should be stored securely to prevent unauthorized use and should be regularly inspected.

8.1.13. Scaffolding and Safe Means of Access

The Contractor must fully comply with all relevant local legal requirements with regard to the construction, design, composition and maintenance of scaffolding and working platforms. For complex scaffolds an appropriate scaffold design must be developed and approved by an appropriately competent person.

The Contractor must ensure the scaffold is routinely and thoroughly inspected and ensure that evidence of inspections are available for inspection. The scaffolding floor must be fully boarded and tied in. The edges must be provided with appropriate guardrails, toe boards and sheeted where necessary to prevent danger to persons below. All scaffolders must follow a safe method of work and risk assessment to prevent falling objects such as tools and poles. Scaffolding may be erected or altered only by competent persons, who should carry out regular inspections and maintain the scaffolding register.

Mobile scaffolds, towers and power operated work platforms must be used in accordance with the appropriate local regulations and codes of practice. All scaffolds must be appropriately secured, fenced and / or alarmed to prevent unauthorized use or access. Where a scaffold is not safe to access it must be clearly marked as such.

8.1.14. Overhead Work

Overhead work is prohibited in places where people or vehicles are present, or where they may enter during the work when the possibility of falling objects exists. Warning signs and barricades must be placed in areas affected by overhead work. Tools, materials, and equipment must not be left unattended on ladders, scaffolds, or platforms from where they may present a hazard. Where possible tools and equipment must be appropriately tethered in order to prevent materials falling from height. Contractors must ensure that voids, shafts and risers are protected at all times including appropriate edge protection, toe boards / floor protection to prevent falling materials, sheeting where necessary and a clearance zone within the immediate proximity of the void or shaft to prevent work. Clearance zones must be clearly marked with warning signage and suitable barriers.

8.1.15. Crane, Hoist, and Lifts

Use of cranes, hoists, forklifts, helicopters, and other lifting machinery require prior approval from an authorized Company Representative prior to use on any work site. An up-to-date annual or periodic inspection report certifying such equipment must be made available for review by the C&W Company Representative upon request. The Contractor, when carrying out any lifting operations shall ensure they are performed in a safe manner and in accordance with any associated local legislation, standards or codes of practice. All lifting operations must include a safe system of work and a suitable and sufficient risk assessment. The Contractor must have available, at all times, for inspection by the Company Representative:

- The appropriate statutory inspection reports/certificates as required by local legislation for all lifting equipment used,
- Evidence that any operative conducting lifting operations or operator of any crane or lifting machine is trained and competent.

The Contractor must also consult with the Company Representative before carrying out any lifting operation with a crane or lifting machine to ensure that an appropriate safe system of work or 'lifting plan' has been devised and agreed, which would include reference to:

- Ensuring that the ground or place where the crane or lifting machine is standing is suitable and capable of withstanding the weights likely to be imposed on it,
- Ensuring that suitable equipment has been selected,
- Ensuring that no part of the crane or lifting machine is likely to foul overhead gantries, pipelines, electric lines or adjacent electrical conductors. Careful attention must also be given to the proximity of overhead electrical lines,
- Ensuring that where more than one lifting operation is taking place simultaneously, that appropriate precautions are in place to enable them to be performed safely,
- Ensuring that environmental conditions (e.g. weather) remain safe and suitable for the lifting operation.

A permit to work will likely be required for lifting operations.

8.1.16. Power Tools

The Contractor will only use power tools that are double insulated or equipped with grounded power cords. Ground Fault Interrupters (GFI) or other similar devices shall be used in wet or damp locations. Documented inspection and maintenance reports, or "In service" tags must be made available for review by the C&W Company Representative upon request.

8.1.17. Lasers and Radiation

Contractors must obtain prior approval from the C&W Company Representative before bringing lasers or radioactive devices onto the site. Laser and radiography operators and users of radioactive sources must be properly qualified, trained and licensed, and take all necessary precautions to prevent laser or radiation exposure to others in the area.

8.1.18. Subsurface Work

Subsurface work includes excavating, trenching and shoring, drilling and boring and any work involving underground utilities. Contractors must obtain written instruction / authorization from the C&W Company Representative before starting such work. Contractors proposing to excavate, dig, bore, tunnel or disturb the earth in an area that may damage buried utilities, are required to make provisions for pre-work identification and protection of the utilities. No construction work which is liable to create a risk to health or safety from an underground service, or from damage to or disturbance of it, is to be carried out unless suitable and sufficient steps have been taken to prevent the risk, so far as is reasonably practicable. All excavations must be appropriately protected to prevent collapse and falls from height into the excavation. Contractors must ensure a safe system of work identifies what appropriate engineering solution is needed (e.g. shoring, battering or stepping) for any excavation process.

8.1.19. COVID-19 and other infectious diseases

Any Contractor working on behalf of the Company must ensure that they abide by any site rules, signage, policies and protocols implemented at any workplace and designed to reduce the transmission of infectious diseases e.g. COVID-19. The Contractor must familiarise themselves with the relevant site protocols prior to starting work and should conduct their activities in such a way as to ensure site protocols are complied with.

Where appropriate Contractor pre-work risk assessments and method statements must include reference to infectious diseases as a hazard and put in place appropriate mitigation measures (e.g. physical distancing, hand hygiene) in order to reduce the risk of pathogen transmission during the work. Contractor operatives must be trained in the prevention of pathogen transmission where appropriate.

8.1.20. Occupational Health

Contractors must implement arrangements to ensure the ongoing occupational health of their workforce:

- Noise - Eliminate noisy activities on site where possible. Acoustic panels/blankets and appropriate warning signage must be in place to control noisy activities. PPE (ear defenders) must be worn as a last resort.
- Dust - Contractors must consider pre-cut / pre-drilled off-site manufacturing methods where possible. Dust and fume extraction, local exhaust ventilation (LEV) with minimum M-class filters must be used. Operatives wearing respiratory protective equipment (RPE) must be face fit tested and filters to be minimum FFP3 for maximum protection.
- Vibration - Use low vibration rated tools and carry out hand arm vibration (HAV) monitoring. Contractors to ensure workforce are aware of daily exposure limits and carry out annual health checks.
- Manual Handling - Contractors must ensure that all relevant personnel are provided with suitable information, training and instruction to ensure safe manual handling. Equipment to prevent / reduce required manual handling must be used where practicable.

8.1.21. Chemical Use Approval

Contractors must obtain approval, following the site-specific chemical approval process, for all hazardous materials (solid, liquids, gases and compressed gases) and their methods of storage, use and disposal prior to bringing them onto any work site. C&W reserves the right to disapprove the use of specific chemicals on any work site. Contact the Company Representative for the site-specific approval process. Chemicals must be removed from site when no longer used; no redundant chemicals shall be stored on site.

8.1.22. Safety Data Sheets (MSDS or SDS)

Contractors must maintain a current copy of the MSDS/SDS for each chemical, as well as a current inventory of all chemicals brought onto the site. Data sheets must be maintained at the work site and must be easily accessible to Contractor employees, the Company Representative, authorized audit personnel, and emergency response personnel always.

8.1.23. Chemical Storage

The Company Representative prior to the start of work must review and approve storage of any chemicals at the work site. Where hazardous substances are permitted, where possible the least hazardous product should be used. Containers of hazardous materials must be used and stored according to manufacturer's recommendations on the MSDS, local legal requirements, and site-specific requirements, in order to prevent releases to the environment. This requires selecting locations and methods to minimize exposure to the elements; limiting the allowable quantity of chemicals stored at the site; and using enclosures, shelters and secondary containment where necessary.

Incompatible chemicals must be separated and placed in separate secondary containment. Depending on local regulations and code requirements, approved chemical storage cabinets and ventilated storage areas may be necessary to reduce fire, explosion, or health risks. Containers must be of the proper type, closed and in good condition. Storage areas must be provided with all legally required markings and signage.

8.1.24. Container Labeling and Usage

Chemicals brought onto the site must be properly labeled with, as a minimum, the identity of the chemicals and the associated hazard warnings. Labels must also meet all applicable legal requirements.

All Contractor chemical use at the work site must be approved by the Company representative and must comply with all legal and regulatory requirements and standards.

Chemicals must not be used in a manner that may result in exposure to non-contractor employees and which may result in complaints or business interruptions. Chemicals must not be used in occupied areas or near HVAC air intakes. Contractors must evaluate chemical hazards and provide appropriate training and protection.

9. Environment

9.1.1. Chemical Spill Prevention and Control

Contractors are required to develop and maintain a spill prevention plan to ensure that contractor activities do not present the risk of a spill or release. Contractors using chemicals must do everything reasonably practicable to eliminate the potential for spills, drips or leaks. Ensure mobile machinery / generators have the correct size drip tray beneath them at all times.

Spill prevention activities include, but are not limited to:

- Chemical delivery:
 - adequate secondary containment,
 - transported using EHS-approved routes,
 - chemical delivery times and routes approved and specified by site EHS or other C&W designated representative,
 - Contractor present when product is delivered to the Client site,
 - Contractor's workers trained in chemical spill prevention to accompany Contractor during delivery/transfer of any chemicals.
- All liquid chemicals must be stored in containers with spill containment.
- Chemicals used outside must be protected from inclement weather.
- Chemicals not immediately in use must be stored in designated spill containment areas or areas with proper spill containment, and if flammable, inside an approved fire-rated cabinet
- All Contractors are required to have a plan for handling and disposal of chemicals, and to demonstrate that the protocol has been communicated to employees and subcontractors

9.1.2. Chemical Spills

Chemical spills or releases inside or outside of a work site, regardless of quantity must be reported and properly managed as defined by the site's Emergency Preparedness and Response program. Program elements include reporting, containment, cleanup, disposal, and environmental agency notification, as required.

C&W defines a spill as an uncontained release of a chemical, and the volume of the spill and category of the material determines response. Contractors who observe a spill in progress or after it has occurred must:

- follow the site emergency reporting procedure by calling the emergency number immediately,
- secure the work area and evacuate the area, if it is safe to do so,
- immediately notify the C&W Company Representative (by telephone) and the Contractor Manager or Supervisor.

Contractors may clean up chemical spills only if they have been specifically trained to do so and are so authorized by the relevant Emergency Preparedness and Response program.

A written incident report must be submitted to the C&W Company representative within twenty-four (24) hours of the occurrence. The written report must include the following details:

- Reporting person's name and telephone number
- Description of the spill/release, estimated quantity and type of material spilled/released
- Disposition of the spilled/released materials
- Location, date and time of the spill/release
- Copy of MSDS/SDS for material spilled/released
- Steps taken to reduce, eliminate and prevent recurrence of the spill or release

9.1.3. Asbestos-Containing Materials

Asbestos-containing materials (ACM) and potential asbestos containing materials (PACM) may be present or encountered at the work site. Where possible C&W will inform Contractors of the presence of known ACM in the work area, however, it is incumbent on the Contractor to expressly request access to review the site asbestos registers prior to starting work. Prior to commencing work, the Contractor must co-operate and co-ordinate with the Company to ensure that all relevant hazards are known in advance of starting work where reasonably practicable. Where asbestos may be present, the contractor must develop, document and implement an appropriate procedure in the event that asbestos is discovered.

Upon discovery of materials suspected to contain asbestos, Contractors must stop work immediately and notify the C&W Company Representative. ACM that may be disturbed by renovation or demolition will be removed prior to or concurrently with, construction activities by appropriate competent and licensed contractors in a controlled manner. Only C&W approved asbestos abatement contractors will be authorized to remove, repair, disturb or handle ACMs.

9.1.4. Mold

If Contractors observe anything that appears to be an area contaminated by mold or mildew, contact the C&W Company Representative. Contractors must not disturb an area suspected to be contaminated with mold or mildew.

9.1.5. Fluorescent Bulbs and Tubes, Electronic and PCB-Containing Ballasts

Contractors removing fluorescent light bulbs are responsible for packaging the bulbs and ballasts, delivering them to an on-site area designated by C&W or our client(s) for recycling or disposal. Fluorescent and HID lamps may contain mercury. Lamps must be protected from breakage while being removed or transported to the designated waste storage area.

9.1.6. Air-Conditioning Maintenance

Contractors responsible for undertaking maintenance of air-conditioning systems must ensure that relevant environmental legislation is complied with. This includes:

- holding relevant certification and operative refrigerant handling certification as required by local regulation
- completion of leak testing with the frequency as required by local legislation,
- provision of signed and dated records of the work undertaken,
- labelling of air conditioning systems where required,
- completion of relevant records when refrigerants are removed from site,
- report of any leaks of refrigerants identified to the Company Representative.

The contractor must put appropriate procedures in place to prevent the release of refrigerant gases through their operations.

9.1.7. Indoor Air Quality

The Contractor must implement procedures for investigating and responding to indoor air quality incidents and complaints as required. Contractors must contact the C&W Company Representative before beginning activities that are likely to generate odors in or near occupied areas or building air intakes (e.g. use of paints, adhesives, internal combustion engines or other odor-producing chemicals or processes). Ventilation or other process controls must be initiated to prevent buildup of vapors, gases or particulates that could present health hazards, fire hazards, or nuisance odors.

9.1.8. Discharges to Stormwater Systems

Discharge to a Stormwater conveyance system of any substance or material other than rainwater is strictly prohibited. Examples of prohibited activities include rinse water from vehicle or equipment washing and discharge from treated water systems such as cooling tower water.

Any non-rainwater discharge to a storm drain is considered a release and must be immediately reported to the C&W Company Representative. A stormwater conveyance system may be a stormwater drain, sanitary sewer, parking lot, ditch, loading dock or the ground. Contractor's outdoor activities must include plans to prevent and contain accidental or unauthorized releases to any stormwater conveyance system.

9.1.9. Wastewater

No hazardous materials, chemicals, or petroleum products may be disposed in sanitary sewers. Contact the C&W Company Representative to verify the appropriate drain or collection method for wastewater discharge. Follow the site reporting procedure in the event of any spill or discharge that threatens to enter a sanitary sewer.

9.1.10. Waste Management and Disposal

Contractors will clean up all non-hazardous waste or debris resulting from the Contractor's supplied materials and work activities. Contractors will manage waste materials according to contract or agreement with C&W, or as specified by the C&W Company Representative.

Contractors are expected to fully support any site based recycling programs. Contractor's non-hazardous solid waste generated from or related to the work (e.g. paper or cardboard, beverage containers, food waste) must be separated and placed in the designated on-site containers for recycling or disposal assuming appropriate authorization has been provided.

Contractors must follow the waste hierarchy and waste duty of care requirements, as well as take all reasonable steps to:

- Prevent the unauthorised or harmful deposit, treatment or disposal of waste.
- Follow the requirements of any environmental permit or permit condition.
- Prevent waste escaping from your control.
- Ensure waste carriers have the correct authorisation and an accurate description of the waste prior to waste transfer.

All relevant legislation relating to the control of substances hazardous to health is to be adhered to at all times.

Contractors will not remove or dispose of hazardous or other regulated waste generated at the work site unless expressly authorized to do so in writing, or as otherwise instructed by an authorized Company Representative. The C&W Company Representative will work with the Contractor to determine the best disposal options for hazardous or regulated wastes.

Contractors must obtain permission from the C&W Company Representative before disposing of any hazardous waste in a C&W or client waste container.

10. Appendix One

The table below lists additional relevant local rules document that may be applicable:

Document Number	Document Name
Text	Text
Text	Text
Text	Text