



Global Services

EHS Policy / Procedure

Communications Policy

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Distribution: Safety Share Point Site

Reference:

GSSP-019

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0.0

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1st Dec 2016

Communications Policy

1.0 PURPOSE

This policy is developed to promote and ensure that regular communication is maintained between managers and employees and EHS standards, procedures, safe work practices and measures are communicated to employees.

2.0 SCOPE

This policy is to ensure that on-going effective communication, and the exchange of information is established and maintained regarding the health and safety of Employees. This policy applies to all Vertiv Field Services Employees.

3.0 PERFORMANCE TRACKING MEASURES

To be determined

4.0 REFERENCE DOCUMENTS

Vertiv Safety Commitment
Vertiv Safety Mission

5.0 DEFINITIONS

5.1 (EHS) Environmental Health & Safety:

Environmental protection, occupational **Health** and **Safety** has two general objectives: prevention of incidents or accidents that might result from abnormal operating conditions on the one hand and reduction of adverse effects that result from normal operating conditions on the other hand.

5.2 Behaviour Base Safety/STOP Program©:

Safety Training Observation Program is the application of behavioural psychology to promote safe behaviour in the workplace using employee involvement. It involves initially identifying practices (behaviours) critical to reducing the risk of injury. These practices and behaviours are then compiled into a checklist that employees use to collect data on safe and unsafe practices within the organization. Finally, employee teams analyse data gained from observations to develop action plans that promote continuous improvement in safety.

6.0 RESPONSIBILITIES

To ensure that this EHS Communication Policy is conveyed and documented in accordance with the procedures listed in this policy, the following ENP Field Services Employees are given the following responsibilities;

6.1 Safety Manager

The Safety Manager or designee has the responsibility for coordinating EHS communications along with the Managers and the Employee. Specific responsibilities include:

- Implementation of this policy in accordance with applicable OSHA, local government, &/or Vertiv standards.
- Conducting an annual Employee EHS Communication Policy audit to determine effectiveness and compliance with the procedures established by this policy which includes noting deficiencies

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and/or observations of non-compliance and establishing corrective action plans to address noted items.

- Annually reviewing and updating this policy as necessary to reflect changes in regulatory, Vertiv Network Power, and/or Vertiv requirements.

6.2 Upper Management/Human Resources

- Ensure that managers carry out the responsibilities assigned to them under this policy.
- Ensure that managers are allowed the appropriate time to carry out their responsibilities.

6.3 Direct Managers

Direct Managers have the overall responsibility for ensuring that they regularly communicate EHS issues to employees that report to them. The types of communication can include.

- Safety Bulletins
- Safety/Technical Meetings
- EHS Site Survey/Tailgate Safety Meeting
- Safety Committee Minutes
- Risk Assessments
- Incident reports and corrective actions
- Information on protective and preventative measures
- Managers must schedule and document the employee's attendance at the safety communications.

6.4 Employees

- Employees shall attend scheduled safety meeting.
- Communicate safety concerns and unsafe conditions to management.
- Communicate Environmental, Health & Safety concerns to fellow employees.
- Make safety recommendations
- Employees will be held accountable for carrying out their respective responsibilities under this policy.

7.0 EHS Communication Policy

One of the most critical elements of any safety policy is clear communications. This includes managers clearly communicating policy and practices to employees as well as employees keeping their managers informed of problems and conditions at the work sites. Lastly, it is imperative that employees communicate safety issues with each other.

7.1 Methods of Communication

There are many methods of communication that Vertiv Network Power can use to communicate to its Employees. Communication may be verbal, text, telephone, by computer, demonstration, hand-outs, and meetings. Communications shall assist in establishing proficiency in the work practices required for the employee to perform their job. Forms of communications can include the following;

- Safety Bulletins
- Safety Alerts
- Safety/Technical Meetings
- EHS Site Survey/Tailgate Safety Meeting
- Safety Committee Minutes
- Risk Assessments
- Incident reports and corrective actions

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- Information on protective and preventative measures

7.2 EHS SITE SURVEY/JOBSITE TAILGATE (JOB BRIEFING)/Risk Assessment SAFETY MEETING

- Employee(s) shall conduct an EHS site survey/jobsite tailgate safety meeting before the start of each job. If the work or operations to be performed during the workday are repetitive and similar, at least one tailgate meeting shall be conducted before the start of the first job of each day or shift. Additional site survey/tailgate meetings shall be held if significant changes, which might affect the safety of the employees, occur during the course of the work.
- A concise discussion is satisfactory if the work involved is routine and if the employee(s), by virtue of training and experience, can reasonably be expected to recognize and avoid the hazards involved in the job. A more extensive discussion shall be conducted if the work is complicated or extremely hazardous or the employee cannot be expected to recognize and avoid the hazards involved in the job.
- Site survey/tailgate meetings must involve employees, owners, customer/client and subcontractors working with us.
- Our Company shall advise the client of:
 - Any unique hazards presented by our Company's work.
 - Any unanticipated hazards found during our Company's work that the client did not mention, and
 - The measures that our Company took to correct any hazards reported by the client to prevent such hazards from recurring in the future.
- Site survey/tailgate meetings must be documented on the company's site survey/tailgate safety meeting form. Documentation must include attendance roster, lead technician/engineer's name, Personal Protective Equipment required, safe work procedures and safety topics discussed.

7.3 SAFETY/TECHNICAL MEETINGS:

- Each service centre must hold a monthly safety meeting; these meetings can be in conjunction with any environmental, training, or technical meetings.
- Document the service centre safety, environmental, technical and training meeting minutes on the company meeting minute's form. Maintain written records with attendance and minutes of each meeting. Copies of written Service Centre Safety, Environmental and Training Meeting Minutes must be sent to the business unit safety manager.
- Any employee unable to attend this safety/environmental meeting must review the meeting minutes, safety alerts, safety topics, environmental topics, etc. He or she must sign and date the attendance sheet that the material was reviewed.
- At these safety meetings review the following:
 - Audits and evaluate safety/environmental activities and identify policy deficiencies
 - Audit and document training of new employees and required re- training of all employees.
 - Provide Management with timely input and feedback on policy design and implementation.
 - Review accident reports and evaluate whether the cause of any unsafe act or condition was properly identified and corrected.
 - Assess the effectiveness of safety and health communications and training.
 - Discuss safety topics appropriate to the needs of the employees and suggest such topics for future safety and technical meetings.
 - Review the use of site survey/tailgate safety meetings. Direct the use of on-site safety meetings on multi-person projects.
 - Perform inspections of the shop to locate and identify safety and health hazards.
 - Review and take appropriate action on suggestions made by others that would help in creating a hazard-free work environment.
 - Provide input to the business unit safety manager on safety award recommendations.

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7.4 SAFETY COMMITTEE

Safety committees are established to assist with the improvement of conditions, policies, and policies so that all employees can work safe. The committee should be an effective tool to help prevent unsafe practices and conditions, reduce the risk of injury and illnesses and to help motivate all employees to become actively involved in the health and safety policy. Safety committee meetings will be held on a regular basis and at a minimum quarterly. Some of the responsibility of the committee can include;

- Communicate safety information
- Field test new Personal Protective Equipment
- Act as a site safety representative
- Act as a safety liaison between employees and their Manager/management
- Provide informational updates related to safety issues, and concerns for to ongoing issues
- Assist in writing Methods of Procedures, Job Hazard Analysis and assisting with filling out customer requirements.
- Report all unsafe conditions and acts
- Contribute ideas and suggestions for improvement of health and safety
- Influence others to work safely
- Encourage the reporting of near misses
- To help ensure compliance with government and Vertiv Network Power safety

7.4.1 Membership Terms

Members will service terms on the committee. The terms will be determined by the BU.

7.4.2 Membership Roles

The committee will have members with different responsibilities;

- Chair Person
 - Monitor progress of ongoing safety issues and projects
 - Will prepare the agenda for next meeting.
 - Arrange meeting location or meeting conference call
 - Notify members of meeting
 - Set time schedule for meeting
 - Review previous minutes and material for meetings
 - Conduct meeting
- Secretary
 - Record minutes of meeting
 - Distribute minutes to committee members
 - Post minutes for other employees
 - Report status of recommendations
 - Assume chairperson's duties if required
- Member
 - Function as a representative of employees
 - Report unsafe conditions and practices
 - Contribute ideas and suggestions for improvement of safety
 - Work safely
 - Influence others to work safely
 - Work with manager to eliminate hazardous conditions and unsafe work practices
 - Communicate the activities of the safety committee with all other employees.
 - Attend all Safety Committee Meetings

7.5 SAFETY RECOMMENDATIONS:

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Safety recommendations are strongly encouraged. You can submit a recommendation at any time throughout the year. You can submit your recommendation through your manager, safety engineer, safety committee or the business unit safety manager.

One method to communicate your recommendation is to use the **Safety Recommendation form**. Recommendations will be evaluated and responded to in a timely fashion. No one will be discriminated against in any way for making safety recommendation, or for making safety related complaints.

It is company policy to accept and investigate any reports of safety, health or environmental hazards, including those submitted anonymously, in a manner that insures employees that they will not be subject to reprimand or reprisal.

7.6 BEHAVIOR BASED SAFETY:

- Some Customer's may require the behaviour based observation policy which focuses on the behaviour of people (actions and attitudes). While unsafe conditions must also be identified, the main focus of the behaviour based observation policy is to identify and eliminate hazardous behaviours before the behaviours create an unsafe condition or lead to an incident.
- People-based observations shall be categorized according to the common behaviours noted on the STOP observation form:
 - a) The Reactions of People;
 - b) The Positions of People
 - c) Personal Protective Equipment (PPE);
 - d) Use of Tools and Equipment;
 - e) Use of Procedures;
 - f) Work Area (Housekeeping).
- Similarly, the behaviour based observation policy shall also identify potentially hazardous or unsafe **conditions** which may pose a risk to site personnel. The categories used to assess site conditions shall be described under:
 - a) Tools and Equipment
 - b) Work Areas;
 - c) Positions of People
- The STOP observations (behaviours and conditions) shall be compiled and reviewed at the site on a weekly basis at a minimum. Both positive and negative observations shall be reviewed. Safe observation forms shall be compared against the requirements of our and the customer's safety policies. Behaviours or conditions that fail to comply with these mandatory requirements shall be elevated for review by the service centre manager and considered for potential classification as Significant Near Miss Incident.

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THE STOP SAFETY OBSERVATION CYCLE

8.0 Forms

EHS Site Meeting
Safety Committee
Service Center EHS Meeting Minutes
Safety Recommendations
Behavior Base Safety Observation STOP form



Survey/Jobsite Tailgate Meeting