Contractor EHS Policy

SEHS 21.0

1. Purpose
   1. The Contractor Safety Policy has been developed to outline the safety requirements for contractors working at ATI Forged Products. This policy is consistent with Occupational Safety & Health Administration (OSHA) requirements.
2. Scope
   1. This process procedure applies to all contactors performing work for ATI Forged Products Business Units.
3. Definitions
   1. **Green (Vendor Approved) –** A contractor receiving a Green rating is automatically approved to perform work at this Company.
   2. **Yellow (Approval Contingent on EHS Departments Decision) –** A contractor receiving a Yellow rating is subject to either approval or denial by the EHS department. If the contractor is denied they must be given feedback on the corrective action that needs to be assigned in order to reach Green status. Note: A Contractor may receive a yellow rating while still being able to perform work at this Company upon the approval of the EHS Department.
   3. **Red –** Improvement Required/Corrective action must be taken in order to perform work at this Company. Contractors in this status may be removed from the approved contractor list after EHS, Facilities and Supply Chain review scope of work deficiencies.
4. Responsibilities
   1. This policy will be administered by the EHS, Maintenance, Supply Chain Management/Purchasing and Facility Engineering Departments with specified duties as follows:
      1. Supply Chain Management/Purchasing:
         1. Will advise and provide the Contractor with all Company documentation required under this policy.
         2. Will ensure that the EHS Questionnaire (SEHS-F 21.1) has been completed, requested OSHA Logs have been provided, the Contractor Safety Acknowledgement of Receipt (SEHS-F 21.2) and Certificate Liability Insurance has been completed and returned.
         3. Document revision to be viewed and approved b Purchsing Manager or designee prior to issuance.
         4. Adding new contractors to the Approval List.
      2. Project Manager/Maintenance Supervisor:
         1. Take steps to protect contract workers who perform work on or near potentially hazardous processes.
         2. Explain the applicable provisions of Company procedures pertinent to work being performed such as Lockout/Tagout, Confined Space, Hot Work Permits, Emergency Action Plan and Personal Protective equipment.
         3. In conjunction with the contractor, complete and retain permits required by Company Procedure to include Confined Space and Hot Work Permits.
      3. EHS Department:
         1. Will provide training as requested by Project Manager or Supply Chain Management/Purchasing.
         2. Communicate Company Contractor Safety requirements.
         3. In conjunction with Supply Chain Management/Purchasing, will assist the Contractor in the Certification process and subsequent renewal.
         4. In conjunction with the Project Manager/Maintenance Supervisor, will retain on file, pertinent written instruction and/or permits generated through Hot Work and Confined Space activity. Will assist the Project Manager/Maintenance Supervisor in meeting the requirements of all Company Procedures.
         5. EHS Department will determine and manage contractors color code per Section 3.0
         6. EHS will retain all documentation required by this policy and ensure that all conditions have been met prior to Contractor Certification approval and release passed onto the EHS department
5. References
   1. [SEHS-F 21.1 – Pre-Qualification EHS Questionnaire](http://www.atiatwork.com/business/ladish/safety/_layouts/WordViewer.aspx?id=/business/ladish/safety/Forms/SEHS-F%2021.1.docx&Source=http%3A%2F%2Fwww%2Eatiatwork%2Ecom%2Fbusiness%2Fladish%2Fsafety%2FForms%2FForms%2FAllItems%2Easpx%3FView%3D%7BE53EA951%2D722C%2D46D6%2D9246%2DCAEB0302951E%7D%26FilterField1%3DLocation%26FilterValue1%3DFP%2520ALL&DefaultItemOpen=1&DefaultItemOpen=1)
   2. [SEHS-F 21.2 – Contractor EHS Policy – Acknowledgement of Receipt](http://www.atiatwork.com/business/ladish/safety/_layouts/WordViewer.aspx?id=/business/ladish/safety/Forms/SEHS-F%2021.2.docx&Source=http%3A%2F%2Fwww%2Eatiatwork%2Ecom%2Fbusiness%2Fladish%2Fsafety%2FForms%2FForms%2FAllItems%2Easpx%3FView%3D%7BE53EA951%2D722C%2D46D6%2D9246%2DCAEB0302951E%7D%26FilterField1%3DLocation%26FilterValue1%3DFP%2520ALL&DefaultItemOpen=1&DefaultItemOpen=1)
   3. [Approved Contractors List – Cudahy Operations](http://www.atiatwork.com/business/ladish/safety/_layouts/xlviewer.aspx?id=/business/ladish/safety/Approved%20Contractors%20List/Approved%20Contractors%20-%20Cudahy%20Operations.xlsx&Source=http%3A%2F%2Fwww%2Eatiatwork%2Ecom%2Fbusiness%2Fladish%2Fsafety%2FApproved%2520Contractors%2520List%2FForms%2FAllItems%2Easpx&DefaultItemOpen=1&DefaultItemOpen=1)
6. Procedure
   1. CONTRACTOR SELECTION CRITERIA:
      1. In order to perform services for this Company, all contractors must be certified by the EHS Department, through Supply Chain Management/Purchasing. Certification will require the completion of the EHS Questionnaire and providing OSHA 300 logs (3 years), and Certificate of Liability Insurance, as requested.
      2. After initial certification, Contractor status will be reviewed on a periodic basis as determined by EHS Department and concurred by the Supply Chain Management/Purchasing.
      3. Under emergency conditions, Supply Chain Management/Purchasing may retain contractors unable to submit the required pre-certification information prior to project start. Under these conditions the contractor will be given 30 days to meet certification requirements.
      4. Proceeding the award of the contract, the contractor shall complete and provide Supply Chain Management/Purchasing Department with the following:
         1. Heavy Service Contractor (Building & Infrastructure installation and repair is regulated by OSHA 1926 Construction Standard or OSHA 1910 General Industry Standard).
            1. Current certificate of liability insurance containing commercial general liability, workers compensation liability and other special coverage if any, auto liability, excess liability. Signed acknowledgement of the Contractor EHS Policy.
            2. Complete the Pre-Qualification EHS Questionnaire and provide the required OSHA 300 Logs.
         2. Light Service Contractor (Copy Machine Service, Stationary delivery, vending service, cleaning service, scale calibration, etc.).
            1. Current certificate of liability insurance containing commercial general liability, auto liability, excess liability, worker compensation liability & other special coverage.
            2. Signed acknowledgement of the Contractor EHS Policy.
         3. Temporary Contractors
            1. On occasion it may be necessary to engage a service contractor on short notice to provide emergency repair and maintenance service. Temporary Contractors may be allowed to perform services without meeting Insurance and EHS documentation requirements.
            2. When applicable the temporary contractor will be escorted by a Company representative to minimize the risk of injury.
   2. CONTRACTOR RATING:
      1. After the EHS Department evaluates the answers to the Contractor Questionnaire each Contractor is put into one of three categories (Green, Yellow or Red). The color assigned to the contractor reflects the completeness of the Contractor’s Safety Policy and determines if corrective action is needed prior to the Contractor to the start of work.
      2. Deficiencies in a Contractor’s Safety Program negatively impact their rating and may warrant corrective action before the Contractor may work at this Company. If the deficiencies outlined in the questionnaire directly relate to the type of work the Contractor performs the Contractor will receive a Yellow or Red rating. A Yellow rating allows the EHS Department to determine whether the Contractor is approved or denied. If given a Red rating, the Contractor will need to implement corrective action to achieve approved status.
      3. If an existing contractor violates the Contractor’s Safety Program and an incident is filed with EHS, then their status will be reviewed accordingly.
   3. TRAINING:
      1. All Contractors will be expected to comply with all training required by OSHA 1910 and 1926 standards. In addition, the contractor will be required to be compliant with Company Procedures on any, or all of the following:
         1. Hazard Communication
         2. Lockout/Tagout
         3. Confined Space
         4. Hot Work Permits
         5. Asbestos Awareness
         6. Personal Protective Equipment
         7. Fall Protection
         8. Fork Lift and Overhead Lifting Devices
         9. Emergency Action
         10. Compressed Gas Cylinder Procedures
         11. Electrical Equipment Grounding Procedures
         12. Bloodborne Pathogens
   4. PERSONAL PROTECTIVE EQUIPMENT (PPE):
      1. The Contractor is responsible for providing all PPE required by OSHA and Company PPE Procedure
   5. FIRST AID:
      1. **Medical Incidents** - any employee injury must be reported to the EHS Department and the Company Project Manager.
   6. DISCIPLINARY ACTION:
      1. Company reserves the right to refuse or cancel access to Company property to any Contractor or their employees for disregarding ATI Company rules. The contractor and contract employees will comply with all rules and regulations that apply. Violations may result in the disqualification of a vendor, termination of a vendor’s contract or refusal to allow contractor employees onto Company property.
7. Attachments and/or Flowcharts
   1. N/A
8. Approvals
   1. Share Point approval to include:
      1. Manager, Safety & Security
      2. Manager, Purchasing
9. records
   1. Aproved Contractors – Cudahy Operations
10. Revision History

| **REVISION** | **DATE** | **SUMMARY** |
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| 5 | 5/10/16 | Entire rewrite of document and given a new number from Doc # 3.6. |
| 6 | 6/22/16 | 4.1.1 (C) moved to 4.1.3 (E) |
| 7 | 7/22/16 | 2.1 – New paragraph. 3.3 – Updated paragraph. 4.1.1 (B) – Added Certificate of Liability Insurance. 4.1.1 (C) – New. 4.1.3 E – Renumbered to F and a new paragraph created for E. 5.3 – Added reference to Approved Contractors. 6.1.1 - Updated paragraph. 6.1.2 – Added “After” to the beginning of the paragraph. 6.1.4 (i) – Added auto liability, excess liability. 6.2.2 Updated paragraph. 6.2.3 – New paragraph. 6.3.1 – Added J-L. 6.5.1 – Changed n to “Any”. 8.1.2 – Added approver. |