1. **Purpose:**
	1. This On-Site Contractor Safety Program guideline is intended to provide Manufacturing, Engineering, and Facilities Management Departments a process for the selection and management of on-site Contractors in the U.S. and their performance regarding employee safety and risk to facilities.
2. **Applicability:**
	1. Local management should use this as a guideline as a means to enforce safe behaviors from Contractor(s) and their respective agents.
	2. The requirements of this guideline apply to all Contractors, subcontractors, and vendors who perform work on American Greetings (AG) property and leased sites.
	3. Contractor personnel, whether management or hourly, shall comply with all applicable laws and regulations, as well as, this guideline as a condition of employment. Failure to observe these regulations shall result in the Contractor being asked to leave the premises.
	4. AG reserves the right to consider such as a failure to perform under the terms and conditions of the purchase order or any other written agreement with Contractor signed by AG and may take action there under.
	5. Consultants and Performing Artists:
		1. Businesses performing consulting services only, are not included in the definition of “Contractor.” Performing artists’ services are also not included in the definition of a “Contractor” under this guideline and are exempt from the pre-qualifications of this guideline.
3. **Definitions and Acronyms:**
	1. AG: American Greetings
	2. AG Project Manager: Any AG associate who:
		1. Solicits bids, quotes or proposals from a Contractor or service vendor; or
		2. Hires an outside Contractor or service vendor; or
		3. Has the responsibility of managing the work being performed by an outside Contractor or service vendor.
	3. Contractor: Any organization, company or individual that contracts or agrees to furnish supplies and/or work or service on an AG facility or its fixtures or equipment for an agreed price to any company or business unit owned by American Greetings Corporation.
	4. Consultant: An individual or company that provides expert advice, reports, cost estimates or similar work product or intellectual property.
	5. High Risk Activities: Activities that requires specific training and safety systems due to the risk levels. This includes but is not limited to:
		1. Permit Required Confined Space Entry
		2. High Voltage live electrical work
		3. Roof or elevated height work greater than 6’ from the walking/working surface
		4. Work with regulated building materials (including lead and asbestos)
		5. Work generating levels of crystalline silica dust exceeding the OSHA PEL.
	6. Large Contractor: Contractor with greater than 5 employees
	7. Small Contractor: Contractor with less than 5 employees
4. **Responsibilities:**
	1. American Greetings Project Manager responsibilities:
		1. Warranting that any Contractor that they contract with to perform work at an AG facility is properly qualified to perform the required work.
		2. Ensuring that new Contractors, and Contractors seeking re-qualification, complete the qualification process in conjunction with the bid process. This includes:
			1. Ensuring that the Contractor satisfactorily completes the safety qualification forms.
		3. Ensuring that prior to commencing work, all applicable documents have been reviewed and approved for the Contractor qualification including:
			1. Contractor Qualification Questionnaire
			2. Code of Business Conduct for Contractors
			3. Non-disclosure Agreement
			4. Contractor Orientation Checklist
			5. Execution of a written agreement with the Contractor or the Contractor Safety & Indemnification Agreement (as applicable)
		4. Denying the use of a prospective Contractor based on information received during the qualification process.
		5. Reviewing active Contractor qualifications on an annual basis.
		6. Confirming the Contractor maintains the required insurance coverages as outlined in Section 9.0 or 10.0.
		7. Documenting a contractor review of all applicable site-specific EHS rules and that the Contractor understands the expectations prior to commencing on-site work.
		8. Maintaining current safety documentation in the Project File.
		9. Management of contractor work activities specific to compliance with all local, state and federal safety and environmental laws and regulations
	2. The facility EHS representative will:
		1. Review the contractor safety qualifications and approve them based on the requirements of this program.
		2. Review Safety Data Sheets to ensure that chemicals brought into the facility do not pose risk to AG associates or create additional environmental exposures.
		3. Maintain original waste disposal records
		4. Maintain and post a list of qualified contractors on a share site with access by other AG locations.
	3. American Greetings Purchasing/Global Sourcing Department responsibilities:
		1. Decline the issuance of a contract or purchase order without receipt of the applicable Contractor qualification documents from the AG Project Manager.
		2. Upon issuance of a purchase requisition, the Purchasing/Global Sourcing Department is accountable for executing purchase order terms and conditions that include adherence to this Guideline.
		3. Ensuring that all work conducted within an AG property, that is characterized as hazardous to health & safety, or otherwise poses a risk to the business, are performed only by approved, properly qualified Contractors.
		4. Maintaining a process where contractors notify the Purchasing/Global Sourcing Department of any substantial change to the Contractor’s Certificate of Insurance (at least annually) or Contractor business status. Purchasing/Global Sourcing will discuss changes in the Contractor’s certificate of insurance with Risk Management prior to approving such change.
	4. American Greetings Corporate Legal Department responsibilities:
		1. Assisting with the evaluation of contractor qualification submissions.
		2. Reviewing legal agreements required by this program to ensure all facets are current.
	5. American Greetings Corporate Environmental, Health and Safety responsibilities:
		1. Assisting with the evaluation of contractor qualification submissions.
		2. Reviewing the On-site Contractor Safety program annually to ensure all facets are current.
	6. On-site Contractor responsibilities:
		1. Complying with all local, state, and federal safety and environmental laws and regulations.
		2. Complying with all applicable safety and environmental standards as communicated by the AG Project Manager and in accordance with the procedures outlined in the Contractor Handbook.
		3. Participating in a review, conducted by the AG Project Manager, of the applicable facility-specific policies and procedures. The checklist shall be completed as documentation of this review.
		4. Informing all crewmembers and/or subcontractor employees of the applicable facility-specific policies and procedures.
		5. The Contractor or subcontractor representative or applicable employees performing work at the AG facility shall meet with the AG Project Manager to obtain and review machine-specific, or work –specific policies and procedures.
5. **Procedure: Pre-Work Qualification**
	1. The following documents shall be collected by the AG Project Manager during the bidding or Request for Proposal process.
		1. Certificates of Insurance
		2. Code of Business Conduct for Contractor
		3. Non-disclosure Agreement
		4. Execution of a written agreement with the Contractor or the Contractor Safety & Indemnification Agreement (as applicable)
		5. Contractor Qualification Questionnaire
	2. The completed Contractor safety qualification forms shall be forwarded to the plant EHS representative or for non-plant facilities to the Corporate EHS Manager for review and approval.
6. **Procedure: Contractor Safety Orientation**
	1. The AG Project Manager shall conduct the Contractor Safety Orientation prior to the contractor or subcontractor commencing work.
	2. The Contractor representative is responsible to participate in a review, conducted by the AG Project Manager, of the applicable facility-specific policies and procedures.
	3. The Contractor Orientation Checklist shall be completed as documentation of this review.
		1. It is necessary only to review those items in the orientation checklist that are applicable to the work being performed.
		2. Completed checklist shall be maintained with the Project File
	4. The Contractor representative is responsible for informing all crewmembers and/or subcontractor employees of the applicable facility-specific policies and procedures.
7. **Procedure: Management of Work Activity**
	1. The AG Project Manager shall be accountable for:
		1. Coordinating periodic safety meetings;
		2. Periodically inspecting/auditing work in process to ensure ongoing compliance with federal, state and local regulations, applicable AG Policies and procedures and this guideline.
		3. Disallow the use of unsafe Contractor tools and equipment.
		4. Obtain the necessary facility safety permits for hazardous work and to provide fire protection impairment notification.
		5. Approve the removal of safety guards or devices in facility equipment.
		6. Issue warnings, require corrective action, remove violators from the premises, and stop any job that is in violation of safety or environmental standards (including plant-specific standards).
	2. All Contractor associates working on AG property must sign in with the AG facility receptionist or guard at the beginning of each workday and shall sign out at the end of the workday.
8. **Procedure: Document Retention**

The Project Manager’s Project File shall contain:

* 1. The completed copy of the Contractor qualification documents, including annual updates
	2. Copy of the applicable Contractor training documentation (including licenses, permits, or other documentation of Contractor employee training
	3. Copies of any equipment inspections and job audits
	4. Copies of applicable waste disposal records or other environmental documents
		1. Original waste disposal records are to be forwarded to the facility EHS representative.
1. **Qualifications: Large Contractor Requirements**

 The following are required to qualify all large Contractors (more than 5 employees)

* 1. Certificate of Insurance with the following minimum coverage:
		+ 1. General Liability - $1,000,000
				1. Higher levels of coverage maybe required based on work being performed
			2. Auto (if applicable) - $1,000,000
				1. Higher levels of coverage maybe required based on work being performed
			3. Umbrella policy – as needed based on work performed
			4. Pollution Liability – Required for work that has the potential for environmental impact.
			5. Professional Liability (or Errors & Omissions) coverage for work defined as “Consulting Services”
			6. Workers Compensation:
				1. Coverage A Limits will be maintained at a “statutory” level and the state whereby the Contractor is working for AG will be listed as a “covered state”.
				2. Coverage B Limits will be maintained at $1,000,000 per occurrence for bodily injury, $1,000,000 per employee for bodily injury by disease, and $1,000,000 aggregate for bodily injury by disease.
			7. American Greetings shall be named as ‘Additional Insured’. This endorsement shall be reflected on the Certificate of Insurance.
		1. Higher levels of coverage may be needed based on the work being performed, including High Risk Activities.
			1. It is the responsibility of the AG Project Manager to work with the facility EHS representative or for non-plant facilities, with the Corporate EHS Manager, Corporate Legal and/ Risk Management to identify appropriate coverage levels.
		2. Questions regarding insurance coverage and requirements, the following resources may be contacted:
			+ 1. Plant facilities: Plant EHS representative
				2. Non-plant facilities: Corporate EHS Manager
				3. Corporate Legal
				4. Corporate Risk Manager
	2. AG Code of Business Conduct for Contractors must be signed by an authorized Contractor representative.
	3. AG Non-Disclosure Agreement must be signed by an authorized Contractor representative.
		1. All information relating to AG’s business and that of any associated company, which is not public knowledge, is confidential and is to be treated as such.
		2. It shall be a condition of the contract between the Contractor and AG that the Contractor will be held responsible for any unauthorized disclosure made by any of its employees or agents and shall take all reasonable precautions to prevent such disclosures.
		3. Contractor representative shall provide a signed Non-Disclosure Agreement as part of the qualification/Request for Proposal process.
	4. Contractor Safety & Indemnification Agreement
		1. Where work is performed without a written contract or written service agreement (e.g. via P-Card transaction, verbal authorization to commence work, etc.), the Contractor Safety & Indemnification Agreement shall be signed by an authorized representative of the Contractor.
		2. AG’s Purchase Order Terms and Conditions may be provided to the Contractor upon request.
	5. Contractor Safety Qualification Form
		1. Must be filled out completely and signed by an appropriate Contractor representative
		2. Must include all safety data
		3. Must identify written safety programs required for the work being performed
		4. Must be signed off by plant EHS representative or for non-plant facilities, by the Corporate EHS Manager.
	6. Injury Statistics Information (Recordable Incident Rate)
		1. The Contractor should have a Total Recordable Incident Rate (TRIR) that is at or below industry average (based on latest available Bureau of Labor Statistics for the Contractor NAICS classification.
		2. Where a Contractor has a TRIR that is greater than 25% above the industry average, the final decision to qualify or disqualify the Contractor company rests with the local EHS representative and shall be based on available information such as;
			1. Availability of other Contractor companies to perform the same work,
			2. Risk level associated with the work, and other applicable considerations.
			3. The EHS representative may request additional information from the Contractor company. At a minimum, information should include:
				1. Documentation indicating why the TRIR is more than 25% above industry average, and
				2. Documentation reflecting corrective actions the Contractor has, or will implement to reduce incident rates.
	7. Training Documentation
		1. Documentation must reflect training completed for compliance with applicable OSHA and EPA training requirements for the work being performed.
1. **Qualifications: Small Contractors Requirements (5 or less employees)**

Small Contractors must complete the qualification process as defined for Large Contractors with the following exceptions:

* 1. Insurance Limits: Insurance limits less than the minimum required for Large Contractors
		1. Corporate Risk Management should be consulted to determine appropriate insurance levels for small Contractors.
		2. May be approved by consensus of Corporate Risk Management, the Project Manager, and EHS representative.
	2. Contractor Safety Qualification Form
		1. Written safety programs are not required.
		2. If Contractor does not have written safety programs they must agree to abide by plant safety procedures for the work being performed.
	3. Injury Statistics Information: OSHA recordable injury data is not required.
1. **Qualifications: Sub-Contractors (Indicated on the Contractor Safety Questionnaire)**
	1. Where a Contractor indicates that they use subcontractors and indicate they have a means to assess the safety performance of their subcontractors, the Contractor must submit supporting documentation showing subcontractor evaluation.
	2. If the Contractor indicates they use subcontractors, but does not evaluate their performance, the subcontractor must complete the On-Site Contractor Safety Qualification Form.
		1. Must be signed off by plant EHS representative or for non-plant facilities, by the Corporate EHS Manager.
2. **Qualifications: Other Work Performed by the Same Qualified Contractor**
	1. When work, other than that for which the Contractor was originally qualified, is performed by the same Contractor, additional information may be required. Based on the type of project/work being performed additional documentation may include:
		1. Additional training documentation
		2. Submission of other written safety programs and/or review of other AG plant policies and procedures
		3. Insurance coverage’s must be reviewed by the Project Manager and local facility EHS representative (and , where appropriate, Risk Management) to ensure appropriate levels (for higher risk work activities)
	2. When a Contractor has been qualified to perform work associated with a specific project that Contractor does not need to be re-qualified for other work being performed at the same AG facility.
	3. When a Contractor has been qualified for work at one AG facility that Contractor does not need to be re-qualified for work at another AG facility if the work being done was qualified at the other facility.
		1. A site specific orientation must be completed and documented at the new facility.
		2. Based on the type of project/work being performed additional documentation may include:
			1. Additional training documentation
			2. Submission of other written safety programs and/or review of other AG plant policies and procedures
3. **Qualifications: Contractor Annual Submissions**
	1. Contractors must submit the following documents annually:
		1. Large and Small Contractors: Certificate of Insurance
	2. Large Contractors:
		1. Contractor Safety Qualification Form
		2. As required by law, updated training documentation
4. **Qualifications: Contractor Re-Certification**
	1. Contractors that are currently approved for work in AG facilities must complete a re-qualification every 3 years.
	2. Contractors must also re-qualify whenever any of the following situations occur:
		1. Contractor company changes ownership
		2. Contractor company changes company name (including DBA’s)
		3. Contractor company goes through re-organization under applicable bankruptcy protection laws (or similar situations)
	3. Individual AG business units are responsible to track Contractor qualification and to ensure re-qualification is completed every 3 years.
	4. Re-qualification of Large Contractors (more than 5 employees) shall consist of the following:
		1. Updated Certificate of Insurance
		2. Signed Code of Business Conduct for Contractors
		3. Updated Contractor Safety Questionnaire
		4. Complete set of applicable training documents for Contractor employees (for work being performed)
		5. Complete Contractor Orientation checklist
	5. Re-qualification of Small Contractors (5 or less employees)
		1. Updated Certificate of Insurance
		2. Signed Code of Business Conduct for Contractors
		3. Updated Contractor Safety Questionnaire
		4. Complete Contractor Orientation checklist
		5. Exception: Small Contractors that are hired to perform High Risk activities must complete the entire requalification process required for Large Contractors.
5. **Qualification Chart**

1. **Training:**
	1. Affected employees will receive training on this guideline:
		1. Upon first assignment to an affected position
		2. Every three years
		3. With changes to guideline
2. **Materials Needed:**
	1. None
3. **References:**
	1. American Greetings On-Site Contractor Safety Qualification Form
	2. American Greetings Code of Business Conduct for Contractors
	3. American Greetings Non-disclosure Agreement
	4. American Greetings Contractor Safety & Indemnification Agreement
	5. American Greetings On-Site Contractor Safety Handbook

**ON-SITE CONTRACTOR SAFETY ORIENTATION CHECK LIST**

The American Greetings Project Manager shall review applicable topics with the Contractor representative prior to commencement of work. Mark items that do not apply with N/A.

This information shall be reviewed periodically based on the Contractor Safety Program. A copy of the signed checklist shall be retained with the project file.

**On-Site Contractor Company Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

Pre-Work Documentation:

* The American Greetings Confidentiality/Non-Disclosure agreement was reviewed and signed by Contractor prior to commencement of work
* The American Greetings Code of Business Conduct was reviewed and signed by the Contractor and/or Subcontractor prior to commencement of work.
* The On-Site Contractor Safety Questionnaire and Insurance Certificates were reviewed and approved prior to commencement of work.
* If applicable, the Contractor Safety & Indemnification Agreement was signed by the Contractor

The following general AG requirements have been reviewed:

* Weapon Policy
* Harassment policy
* Non-Solicitation/Distribution policy
* Smoke and Drug Free workplace

The following site specific EHS related requirements have been reviewed:

* Visitor procedures and daily sign-in requirements
* Mobile device, two-way radio, and photograph policy
* Fire and Severe Weather procedures
* Incident Reporting
* Procedures for work impacting fire protection system (Sprinkler System)
* Pedestrian safety and designated walkways
* Parking lot requirements
* Personal Protective Equipment requirements
* Hazards of chemicals, used by AG, which Contractor employees may be exposed to
* Waste disposal requirements

The following general EHS related requirements have been reviewed:

* Hot work requirements and permit procedures
* Elevated Work requirements
* Machine Lockout/Tagout requirements and procedures
* Confined Space entry requirements
* Use of Forklifts and other powered industrial trucks
* Use of Aerial lifts
* Electrical hazards and precautions
* Chemicals brought on site by the Contractor and requirements for chemical storage/labeling.
* Waste disposal documentation
* Silica dust generation

Contractor Representative: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Contractor Representative Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date: \_\_\_\_\_\_\_\_\_\_\_

American Greetings Project Manager / Representative: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

American Greetings Representative Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date: \_\_\_\_\_\_\_\_\_\_\_

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