

Safety Practices Code

This document covers the minimum safe work practices in regard to fire, safety, security, health, environmental and traffic regulations that govern prime contractors and subcontractors while working within the confines of any Flex|N|Gate facility (the “Work Site”). These requirements are considered as additions to any safety rules or regulations of the contractor. The contractor shall be responsible for informing each member of their team and all subcontractors of fire, safety, security, health, environmental and traffic requirements and standards at all Flex|N|Gate facilities.

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Contractors are responsible for the conduct of their personnel while on Flex|N|Gate property. Failure to maintain proper standards of conduct at all times may and will result in immediate removal of contractor personnel from Flex|N|Gate property.

Contractors are responsible for providing Flex|N|Gate Systems with their Injury and Illness Prevention Program (IIPP) prior to start of job. Contractor shall prepare, communicate to its employees, and enforce the Injury and Illness Prevention Program.

If you have questions regarding safety requirements, or about the safety of a particular operation or activity, contact your supervisor or your employer's Safety Officer. Your Designated Project Manager and Flex|N|Gate Loss Prevention Representative are available for consultation on safety issues.

Definitions

“Flex|N|Gate Project Manager” means the individual within Flex|N|Gate who has the responsibility of managing the contract and the project the contractor is working on.

“Designated Project Manager” means the individual who has been delegated the responsibility of managing the contract and the project the contractor is working on.

“Flex|N|Gate Loss Prevention Representative” means the designated individual within Flex|N|Gate who is responsible for managing Flex|N|Gate's Environmental Health and Safety Program.

General Information

1. EMERGENCY NOTIFICATION PROCEDURES/ACCIDENT REPORTING

In case of any accident, injury or illness, always contact the local general manager at the Work Site. This will activate the Flex|N|Gate Emergency Response Team.

Contractors are responsible for first aid and non-emergency type incidents. First Aid kits can be found in all break rooms. If a serious accident has taken place on Flex|N|Gate property, the contractor shall submit a written accident report. The report should be directed to the Flex|N|Gate Project Manager, as well as the local general manager. This report must be received no later than 24 hours after the incident.

2. AISLES, STAIRWAYS AND SERVICE CORES

Contractor must comply with applicable requirements established by law.

3. HAZARD COMMUNICATION

Contractor will maintain an effective program in compliance with applicable requirements established by law. All MSDS must be submitted to the project Manager prior to starting any work

4. CHEMICALS/CHEMICAL SAFETY

The Contractor will not dispose of any chemical waste or solutions containing chemicals on Flex|N|Gate property. Chemical waste includes, but is not limited to:

- Acids, bases
- Adhesives, glues, cements, epoxies
- Bleaches, cleaners, detergents
- Compressed and liquefied gas
- Core solder (acid, resin)
- Fluxes
- Greases, oils
- Paints, dyes, pigments, fillers

- Pesticides, herbicides
- Solvents, thinners
- Fluorescent tubes (Local governing rules apply)
- VDT's
- Empty containers that once contained any chemicals (refer to MSDS)

Chemical wastes will not be dumped into storm drains, industrial waste or sanitary waste drain systems. Drains, sewers, sinks, rest rooms, trenches, trashcans or the ground shall not be used for disposal of chemicals. The Contractor must separately dispose of all empty aerosol cans, flammable or toxic chemical waste containers outside of Flex|N|Gate properties. Chemical waste will be contained, removed from the site, transported, and disposed of in compliance with applicable local, state, and federal laws.

5. COMPRESSED GAS CYLINDERS

All compressed gas cylinders shall be legibly marked with the name of the material contained. Cylinder marking shall conform to the current American National Standards Institute (ANSI) standards and be marked by means of stenciling or stamping. The Contractor will not store gas cylinders on any Flex|N|Gate premises. Any unusual circumstances which may require cylinder storage must be reviewed and have prior approval of the Designated Project Manager. Compressed gas cylinders will be secured (roped or chained to an immovable object) in an upright position at all times, except when cylinders are being transported. A proper hand truck must be used to move cylinders. Cylinders will be kept a safe distance or shielded from welding and cutting operations. Cylinders will not be placed where they can contact an electrical outlet. Gas cylinders may not be stored inside office areas. When not in use, all cylinders must be properly secured and stored in authorized controlled access areas. Cylinder valve protection caps will be firmly installed (hand tight) when compressed gas cylinders (empty or full) are transported or stored. The correct regulators, in proper working order, shall be used for each type of gas. Regulators or regulator connections will not be modified in any way. Cylinder valves will be closed when work is finished and when cylinders are empty or are being moved. If a gas cylinder develops a leak, immediately remove it to a safe location outside the building. If the leak cannot be corrected, call the Designated Project Manager.

6. CONFINED SPACE ENTRY

Each contractor must comply with applicable requirements established by applicable law. Contractors are also required to include a written confined space plan. This plan must be provided to the designated Project Manager. Confined Space includes storage tanks, bins, sewers, in-ground vaults, tunnels, manholes, pits and other locations which; because of inadequate ventilation and/or the presence of hazardous gasses, vapors or particulates; may present a hazard to your health. All work in confined spaces requires a contractor generated "CONFINED SPACE ENTRY PERMIT". Permits must be reviewed by the Designated Project Manager prior to entry into a confined space. The contractor shall provide the required personnel safety equipment and competent persons.

7. ELECTRICAL-GENERAL

All contractors must comply with applicable requirements established by applicable law

8. EQUIPMENT LOCKOUT/TAGOUT

All contractors must comply with applicable requirements established by applicable law. Flex|N|Gate Project Managers must provide all contractors who are engaged in electrical work a copy of our Lock Out/Tag standard.

The contractor must provide the Project Manager with a copy of their Energy Control Plan for review. Lockout tags will identify the contractor's company name, date and name of Designated Project Manager. Lockout tags must be approved by the Designated Project Manager prior to usage.

9. EXCAVATIONS AND TRENCHS

All contractors must comply with applicable requirements established by applicable law.

10. FLOOR OPENINGS

All contractors must comply with applicable requirements established by applicable law. Floor openings and penetrations greater than 2" (5cm) must be covered/protected. Appropriate signage/warning - Danger! Floor Hole Cover – Do not Remove.

11. HELICOPTER LIFTS

Any proposed usage of helicopters to hoist, set, install or move equipment or materials must have prior approval from the Designated Project Manager. Helicopter lifts may require a permit from the local jurisdiction (city or county). The entire building must be evacuated prior to a helicopter lift.

12. LADDERS

All contractors must comply with applicable requirements established by applicable law

13. HAZARD AREAS

Although this list may not be all-inclusive, there are certain areas and operations on the Flex|N|Gate site where extra precautions must be taken due to the nature of the hazard. Before entering any of the following areas or starting work on any operation within these areas, the contractor is required to check with the Designated Project Manager for a review of applicable safety, security and health rules:

- Building roof and ceiling areas
- High voltage electrical areas
- High noise level areas
- Confined spaces (This includes manholes and waste valve boxes.) See section on confined space entry.

Contractors shall take appropriate measures to safeguard and control pedestrian traffic into or near construction areas.

14. HOUSEKEEPING

Work areas must be kept neat and orderly AT ALL TIMES, for both safety and security reasons. Material should be carefully stacked and located so that it does not block aisles, doors, fire extinguishers, fire blankets, eyewash stations, first aid boxes, fixed ladders, electrical equipment or stairways. Do not allow your tools, equipment and materials to impact areas occupied by Flex|N|Gate. Clean up all non-hazardous liquid spills and drips immediately. Hazardous material spills should not be handled without the proper equipment and training. Nails protruding from

boards must be removed. Concrete form and scrap lumber and all other debris will be kept clear of all work areas. Combustible scrap, waste materials and debris will be removed from the building on a daily basis, preferably at the time of strip-out. Overhead storage of debris, tools, equipment, pipes, etc is prohibited. No loose material will be left in the area above suspended ceiling panels. Interior construction areas will be "broom clean" and all trash will be removed at the end of each workday. The work area will be kept free from any potential tripping hazards. All ceiling tiles removed by the contractor will be replaced immediately after the work is completed, in an undamaged condition. Boxes will not be stacked higher than 4 feet off the ground. Contractor shall promptly clean up dismantled or surplus materials.

15. OVERHEAD WORK

No overhead work will be performed when, as a result of that work, the possibility of a falling object injuring any person exists. Relocation of personnel will be accomplished prior to and maintained throughout the overhead work period. The contractor will make all personnel relocation requests to the Designated Project Manager. Contractor personnel are not permitted to crawl along ductwork, cable trays, piping or other building structures. Defined overhead hazard areas will require the wearing of hard hats for those entering the area. The Designated Project Manager will determine the hazard and notify contractors. During overhead work, **DO NOT SECURE LIFELINES AND APPROVED FALL PROTECTION HARNESS WITH LANYARD TO THE SPRINKLER SYSTEM OR UTILITY PIPING, SINCE THEY MAY NOT POSSESS SUFFICIENT SUPPORT STRENGTH.**

16. PERMITS AND APPROVALS-WORK AUTHORIZATIONS

Please refer to the other sections that this applies to. Separate Permit requirements and Work Authorization requirements. In general, any work requires a Work Authorization. Contractor shall not perform any work on, or at a Flex|N|Gate facility until the Work Authorization form has been completed and signed by all applicable parties. The contractor is advised that a Work Authorization is required for each of the activities listed below. However, contractors are cautioned to always check with their Project Manager before beginning any work:

- All welding, torch cutting, soldering, and open flame work
- Work in Confined Spaces
- Work within 10 feet of an unprotected roof edge
- Work involving Hazardous Materials
- Work on High Voltage equipment or systems. Approved switching orders are required.
- Any construction projects that last longer than 3 days
- Work with power actuated tools
- Partial or full impairment of automatic sprinkler or other fixed fire protection systems

The Work Authorization approval will indicate that those individuals doing the work are aware of the potential hazards, have the proper tools, test equipment, personal protective gear, emergency control equipment, and are prepared to meet all safety, security and health requirements .

17. PERSONAL PROTECTIVE EQUIPMENT

All contractors must comply with applicable requirements established applicable law

18. ROOF WORK

All contractors must comply with applicable requirements established by law. Prior approval of roof entry is required.

19. SECURITY

Identification Badges:

A Flex|N|Gate identification badge is required to be worn in plain sight at all times by everyone working on Flex|N|Gate premises. When you report to work on Flex|N|Gate premises, you may be issued a temporary identification badge that will designate you as a visitor, authorizing you to enter Flex|N|Gate controlled space. Wear the badge so that it can be seen. The badge must be returned to the Security Post or lobby where it was issued upon departure from Flex|N|Gate premises. Unauthorized use of this badge – such as giving it to another person – is prohibited. Contractors assigned to work at Flex|N|Gate on a long-term, daily basis will also need to submit required paperwork and have their pictures taken and wear a Flex|N|Gate picture badge. Contact the Designated Project Manager to arrange this.

Contractors are responsible for the accountability and proper use of access cards and badges issued to them and their personnel. Direct any badging questions or problems to the Designated Project Manager.

Prohibited/Restricted Items:

Alcoholic beverages, non-prescription drugs or prescription drugs for non-medical use, firearms, ammunition or any other material considered a weapon are not permitted on Flex|N|Gate property. Smoking is strictly prohibited in all Flex|N|Gate buildings, including the roof.

Controlled Access:

For Security reasons, entry and exit of Flex|N|Gate buildings is restricted to those areas designated as your work area. Entrance to an area other than where you are working is prohibited, unless authorized by the Designated Project Manager. Building emergency exits are to be used only in the event of an emergency. Without exception, there should never be an occasion for a secured card access, emergency or any other secured doors to be left propped open, unattended, or unlocked. Contact your Flex|N|Gate Designated Representative before opening and entering any roof access areas.

20. SMOKE DETECTORS

The Contractor is cautioned that there are many areas throughout Flex|N|Gate that contain smoke detectors. These detectors are sensitive to smoke, dust and other airborne particles, that can either, hamper proper operations or cause them to alarm. Examples of smoke detector locations are: computer rooms, cafeteria's training and meeting rooms, return air ducts and adjacent to fire doors and corridors. The Contractor must evaluate the conditions that may result from any operation/condition that may produce smoke, dust, flying or other airborne particles must be previously approved by the Designated Project Manager. The Contractor will ensure all appropriate parties, Loss Prevention, Designated Project Manager, local site contact, etc... are notified when working in an environment with active smoke detection equipment. If the work requires the Contractor to encapsulate individual smoke detectors, he/she will ensure all accessible smoke detectors, within the work area, are bagged prior to any work. The Contractor shall also ensure that at the end of each workday that all bags are removed from the smoke detectors. Loss Prevention will disable them where applicable, upon the request of the Contractor and agreement from the Designated Project Manager.

21. STORAGE

Contractor(s) tools, equipment, materials and debris must be properly stored to comply with building and fire codes, and to avoid becoming a hazard to Flex|N|Gate employees and

others. The Designated Project Manager will assign areas where contractor(s) can store tools and equipment. **Aisles, corridors and stairwells can NEVER be used for storage – even temporarily.** All debris must be removed from inside Flex|N|Gate buildings daily. Debris must be taken to a location designated by the Designated Project Manager – or immediately hauled off-site. Dismantled or surplus materials shall be promptly cleaned up by contractor.

22. TOOLS & EQUIPMENT

All contractors must comply with applicable requirements established by law.

23. UTILITIES

It is important that your work does not affect utility services to the Flex|N|Gate premises – particularly those in occupied areas. Contractor(s) must not operate any switch or valve, which controls building services, processes or equipment unless contractor(s) supervisor has obtained written authorization from the Designated Project Manager. A “LOTO” system, which complies with government regulations, must be used to identify and secure switches and controls in the “OFF” position while work is being performed.

24. VEHICLES

Parking

All Contractor(s) vehicles will be parked in designated parking areas only. Parking in reserved spaces, patios, walkways, sidewalks, in front of any buildings or roadways is strictly prohibited. Contractor(s) shall follow parking arrangements as instructed by the Designated Project Manager. Improperly parked vehicles will be towed at the owner’s expense. Loading dock areas may be used for loading and unloading, but afterwards the vehicle must be moved to the designated parking area.

Speed Limits

8 mph (12km/h) speed limit will be observed at all times while driving in Flex|N|Gate parking lots and roadways.

Back-Up Alarms

All haulage and oversized vehicles, such as dump trucks, garbage trucks, ready-mix rigs, etc... must be equipped with audible alarms that sound continuously while the vehicle is backing up.

25. WARNINGS

Warning, safety and security signs, notices and barriers are posted for your protection. They must be observed and followed at all times. (For example; if you are working in a posted “Eye Hazard” area, you MUST wear approved eye protection). When the work being performed has the potential to expose Flex|N|Gate employees or others to hazards, contractor(s) must provide warning signs, barriers or barricades wherever such protection is required by this document or where safe practice dictates it. Where signs and barricades do not provide adequate protection, flagmen (or other additional) protection is required. Multi-lingual signage may be required.

26. XXV. WELDING

Any welding, cutting, soldering or other open flame work either inside or outside on Flex|N|Gate property must receive a “Hot Work Permit” to perform this work on-site. Permits must be obtained from the Designated Project Manager. The contractor will continue the operation only as long as conditions remain safe. All combustible materials in the area must be protected or removed

before you begin work. An approved fire extinguisher must be within reach of all welding/brazing work and other open flames. Contractor(s) must obtain fire extinguishers for contractor(s) use – do not use Flex|N|Gate fire extinguishers (except in emergencies) When working near smoke detectors, special consideration will be provided for control of fumes and detector activation. Refer to “Smoke Detectors” portion of this document. The Contractor is responsible for seeing that a fire watch is maintained throughout the operation. The Fire Watch is responsible for taking appropriate action to prevent a fire, to extinguish incipient fires and to summon assistance from the fire department at 911 if any fire is noticed and/or cannot be extinguished. Fire watch must be posted for 1 hr. after completion of hot work. Non-combustible or flameproof shields or screens must be placed around the work to shield others from eye damage and protect from direct welding rays or arc. Exhaust ventilation is required when performing welding or cutting in confined spaces, or where fumes may present a health hazard or nuisance exposure to you, Flex|N|Gate employees or others. After welding or open flame work is completed, the contractor will inspect the area and remain in the area until it is determined that no smoldering or previously unnoticed fires exist.

IF YOU ARE NOT SURE OF THE SAFETY RULES THAT APPLY TO YOUR CONTRACT, PLEASE CONTACT YOUR DESIGNATED PROJECT MANAGER.

FAILURE TO COMPLY WITH SAFETY GUIDELINES MAY RESULT IN REMOVAL OF THE CONTRACTOR FROM FLEX|N|GATE PREMISES.

27. STANDARDS AND CONDUCT

A. Contractor is to provide to Flex|N|Gate/or designee, and pay all fees for, all permits, inspection or occupancy certificates, maintenance and operation manuals, equipment, warranties, etc.

B. Should the Contractor perform any work that does not comply with the requirements of applicable codes and standards, they shall bear all costs that arise in correcting such defects.

C. All Contractors are required to supply Flex|N|Gate/or designee with an appropriate & valid Certificate of Insurance covering Workman’s Compensation and Liability Insurance before they can work in the building. It is the responsibility of the General Contractor to monitor compliance.

D. Contractors must maintain existing plumbing, heating, air conditioning, fire protection, and other existing systems, and must retain all existing functions in service except for scheduled disruptions. Preferably, all such disruption(s) of system functions should be performed after normal business hours or on the weekend.

E. All work involving core drilling, spraying, or other function that may cause disrupting noise, fumes, or odor, or result in necessary access to any occupied spaces, must be approved by the Designated Project Manager.

F. All penetrations of piping, duct work, conduits, etc. through walls, partitions, and floors shall be sealed to building code requirements to maintain the integrity of the structure’s fire safety rating. Also, any openings in walls and partitions made by the Contractor for access to construction work shall be patched and/or repaired to Flex|N|Gate’s satisfaction. All core drill pieces are to be removed by the Contractor, with the exception of fire sprinkler penetrations, which should be attached to the pipe for the inspector to witness.

G. It shall be the responsibility of each trade to cooperate fully with the other trades on the job to keep the job site in a clean and safe condition. At the end of each day’s work, each trade shall properly store all of their tools, equipment, and materials and shall clean up their debris from the job site.

H. The Contractor shall provide a final clean up of the job site including walls, light fixtures, windowsills, counters, floors, etc.

- (i) Sweeping Compound will be used when sweeping to minimize the raising of dust. Failure to use sweeping compound may result in the mandatory halting of work as enforced by Flex|N|Gate's designated personnel.
- (ii) Contractor is responsible for removing all construction debris from the site. The Flex|N|Gate/or designee trash facility will not be used for construction debris. Contractor will be back-charged for unauthorized use of Flex|N|Gate/or designee trash facility.
- (iii) The building janitorial service may be contracted for clean up work.

I. Contractors shall not utilize electrical/telephone rooms, mechanical rooms, or other unauthorized buildings or paring areas for storage of tools, equipment, materials, supplies, etc.

J. Contractors shall be restricted to designated toilet facilities. Under no circumstances are these facilities to be used for purposes other than their intent (no tool cleanup, etc.).

K. Contractors shall not lounge or eat in the building lobbies, hallways, or stairwells. Breaks may be taken either in the assigned work area, or in common areas such as a restaurant or snack bar to be determined by the Designated Project Manager. It is the contractor's responsibility to ensure good housekeeping practices are enforced after each break period.

L. Loud noises, radios, stereos, TV's, etc are prohibited.

M. Cursing, rough housing, leering, or other objectionable conduct shall result in the immediate halting of work and expulsion from the premises.

N. Proper attire is required.

O. Monitoring of Compliance with the above stated rules and regulations will be done by Flex|N|Gate/or designee.

28. UPDATES

This safety practices code was last updated on June 21st, 2004. A notice will be posted on our Web site home page for 30 days whenever this safety practices code is changed in a material way.

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