



**Key Technology, Inc.**

**Subcontractor  
Management Program**

**July, 2014**

## 1. Purpose

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The purpose of this program is to ensure that Key Technology, Inc. continues to improve subcontractor health, safety and environmental performance and to establish a standard for pre-qualification, evaluation/selection and development of our subcontractors.

A subcontractor for purposes of this program is defined as a person or business who is awarded a portion of an existing contractual agreement entered into by Key Technology, Inc.

This program applies to all Key Technology, Inc. U.S. locations.

## 2. General Requirements

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All Key Technology, Inc. subcontractors are to be managed in accordance with this program.

The use of subcontractors must be pre-approved by a member of the Key Technology, Inc. executive staff. Approval requirements include:

- Assurance that the subcontractor is competent and capable of performing their assigned duties in a safe and environmentally sound manner.
- Assurance that the subcontractor has the appropriate licenses, registrations and insurance to complete their work.
- A formal safety review of the subcontractor being performed by Key Technology, Inc. safety department.
- The scope of the review was commensurate with the hazards and risk exposure.
- Subcontractor has been/will be oriented to the safety policies, expectations and requirements of Key Technology, Inc.
- The subcontractor agrees to abide by our Drug and Alcohol policy and onsite safety rules throughout the duration of the work.

Any subcontractor that has a “Non-Approved” safety status will not be used by Key Technology, Inc.

## 3. Procedure

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### Pre-Qualification of Subcontractors

Subcontractors will be pre-qualified by the department manager or supervisor who has requested the work. The pre-qualification consists of reviewing the subcontractor’s safety programs, safety training documents and safety statistics. *(Refer to– Appendix A, Subcontractor Safety Requirements and Evaluation Checklist.)*

## **Monitoring and Oversight**

Key Technology, Inc. supervisors or managers will verify subcontractor performance throughout the duration of work and will periodically review their compliance with safety procedures and regulatory and work specific requirements.

## **4. Subcontractor Involvement**

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Subcontractors are required to follow or implement the work practices and systems described below while performing work at Key Technology, Inc. worksites:

- Attend a safety orientation provided by Key Technology, Inc. prior to any work beginning
- Attend a pre-job meeting provided by Key Technology, Inc. prior to any work beginning for the following purpose:
  1. To establish a clear line of communication that includes an effective reporting relationship
  2. To define clear roles and responsibilities
  3. Discuss and understand the Key Technology, Inc. Emergency Response Plan so the subcontractor understands their role
- Implement Key Technology, Inc. safety practices and processes as applicable
- Monitor employees for substance abuse and report nonconformities to Key Technology, Inc.
- Ensure personnel have the required training and competency for their work
- Participate in Key Technology, Inc. provided tailgate safety meetings, job safety analysis or hazard assessments and on the job safety inspections
- Perform a pre-job safety inspection that includes equipment
- Report all injuries, spills, property damage incidents and near misses
- Comply with all onsite safety rules
- Clean up and restore the worksite after the job is over
- Ensure compliance with regulations at all times
- Post job safety performance reviews shall be conducted for subcontractors



**SUBCONTRACTOR SAFETY REQUIREMENTS AND EVALUATION CHECKLISTS**

<ul style="list-style-type: none"> <li><b>GENERAL:</b></li> </ul>	<p>Key Technology requires that all subcontractor safety programs, training, and procedures coordinate with Key’s own standards of safety. In addition, subcontractors utilized by Key to provide services to Key customers will be reviewed and qualified by the Customer prior to performing work.</p> <p>Key Technology subcontractors are charged with the responsibility of seeing that all listed rules are followed.</p>		
<p><b>SUBCONTRACTOR FIRM:</b></p>		<p><b>DATE:</b></p>	
<p>1.</p>	<p><input type="checkbox"/> A pre-job safety conference will be held between the Key project coordinator, safety officer, and the subcontractor representatives. Items to be discussed are operational hazards in job area, first aid, hazard communication, lockout/tagout, special safety equipment required because of plant operation hazards, where safety equipment can be obtained, hot work permits, confined space entry permits, and plant safety program. The safety officer will also review Key’s Emergency Response and Action Plan. All accidents must be reported immediately to the project coordinator and safety officer.</p>		
<p>2.</p>	<p><input type="checkbox"/> All subcontractors must be competent and capable to perform assigned duties in a safe and environmentally sound manner.</p>		
<p>3.</p>	<p><input type="checkbox"/> All subcontractors have an established line of communication with Key and have been given defined roles and responsibilities.</p>		
<p>4.</p>	<p><input type="checkbox"/> All contracted work performed will be done in accordance with all local, state, and federal regulations pertaining to health and safety of employees.</p>		
<p>5.</p>	<p><input type="checkbox"/> All subcontractors must have the appropriate licenses, registration, insurance, and certification to perform the contracted work.</p>		
<p>6.</p>	<p><input type="checkbox"/> All tools and equipment issued or used must be maintained in a safe condition regardless of ownership, and must conform to all appropriate sections of the federal occupational safety and health codes. Any defective tools will be removed from service immediately.</p>		

7.	<input type="checkbox"/> The following reports will be forwarded to Key Technology Purchasing Department for the purpose of selecting subcontractors and monitoring their safety activities;;
	<input type="checkbox"/> OSHA 300 logs for the purpose of calculating TRIR and DART
	<input type="checkbox"/> EMR Letter from Subcontractor Insurance Company
	<input type="checkbox"/> General inspections;
	<input type="checkbox"/> General inspections by outside agencies;
	<input type="checkbox"/> OSHA citations/fines
	<input type="checkbox"/> Records of safety training.
8.	<input type="checkbox"/> No smoking is permitted within the facility. Smoking is allowed in designated areas located outside the building.
9.	<input type="checkbox"/> Fire watches will be furnished by the subcontractor when welding or burning. Fire extinguishers will be provided by the subcontractor.
10	<input type="checkbox"/> Subcontractor employees will remain within the designated area of subcontractor's work.
11	<input type="checkbox"/> Hazard Communication: Subcontractors will be informed of any hazardous chemicals to which they may be exposed while on the job-site. Subcontractors bringing chemicals into a Key facility must supply a copy of the Safety Data Sheet to the safety officer.
12	<input type="checkbox"/> Subcontractors will be included in all safety meetings, safety orientations, job safety analysis or hazard assessment and on the job safety inspections.
13	<input type="checkbox"/> If directed by Key personnel to leave the area, subcontractor personnel must do so immediately.
14	<input type="checkbox"/> In the event of a plant emergency, subcontractors are to evacuate the building to the nearest assembly area as designated on the evacuation map.
15	<input type="checkbox"/> PPE including eye protection, hearing protection and safety shoes must be worn in designated areas. All subcontractors sending employees to Key Technology will provide the necessary Personal Protective Equipment as required for the type of work to be done.
16	<input type="checkbox"/> All energy sources are to be locked/tagged out before any work is performed. Key Technology and the subcontractor will inform each other of respective lockout or tagout procedures.
17	<input type="checkbox"/> All temporary electrical wiring will comply with National Electric Code. All electrical equipment must be periodically inspected and properly repaired as necessary.
18	<input type="checkbox"/> Running, shouting or horseplay are strictly forbidden.
19	<input type="checkbox"/> Working without shirts is not permitted in the plant.
20	<input type="checkbox"/> All openings and floors, wall or railways are to be barricaded to prevent personnel from falling into or through a set opening.

21	<input type="checkbox"/> Consumption of alcoholic liquids or the use of illegal drugs is not allowed. Any persons under the influence or in possession of alcohol or drugs (Rx or otherwise) will not be allowed onto Key Technology grounds.
22	<input type="checkbox"/> All areas where work is being done overhead are to be roped off and suitably marked.
23	<input type="checkbox"/> All work areas are to be left in a neat and safe condition before leaving and all trash must be disposed of properly everyday. Waste material must never be thrown from upper level to lower level.
24	<input type="checkbox"/> All passageways, operating areas and roadways must be kept clear of stumbling hazards. Welding cables, hoses and temporary lines should be kept clear of passageways, preferably suspended overhead to eliminate tripping hazards.
25	<input type="checkbox"/> All scaffolding provided will be erected and maintained in accordance with applicable safety and health regulations.
26	<input type="checkbox"/> All ladders must be in accordance with OSHA's safety codes and are to be kept in good repair. Applicable safety laws must be observed in the use of ladders.
27	<input type="checkbox"/> Oxygen and acetylene cylinders must be fastened securely in an upright position.
28	<input type="checkbox"/> Key Technology reserves the right to question unsafe equipment and practices.
29	<input type="checkbox"/> Copies of these specifications are to be issued to the subcontractor. Employees assigned to work on site or with a Key Service Technician, are to have read these rules before starting the job.
30	<input type="checkbox"/> Contactor will participate in post-job performance review to include a safety review and overall job performance.
31	<input type="checkbox"/> These subcontractor safety regulations are a minimal standard. Each subcontractor must take the other precautions necessary to prevent injuries to employees or damage to equipment.
	Additional information here:

<b>SUBCONTRACTOR FIRM:</b>		<b>DATE:</b>	
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*As an authorized representative of the above subcontractor firm, I have thoroughly reviewed the subcontractor safety regulations and subcontractor evaluation required by Key Technology.  
I agree to abide by all of the Key Technology Inc. regulations and will ensure that all subcontractor work performed for Key Technology Inc. will be in accordance with these regulations.*

<b>Authorized Subcontractor Representative (Signature)</b>	<b>Title</b>	<b>Date</b>
<b>Key Technology Inc. (Signature)</b>	<b>Title</b>	<b>Date</b>