



AREVON ASSET MANAGEMENT

POSEY SOLAR LLC



SAFETY & SECURITY PLAN

POSEY COUNTY AREA PLAN COMMISSION

June 2021

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1.0 INTRODUCTION AND PURPOSE

1.1 INTRODUCTION

- This document outlines security and safety protocols & guidelines for Posey Solar project during construction and operation of the project/facility.

1.2 PURPOSE

- All employees, contractors, visitors and suppliers working on or visiting Posey Solar during construction and operations phase shall abide by guidelines and protocols per this Safety and Security Plan.

2.0 SECURITY PROTOCOLS & GUIDELINES

2.1 SITE ACCESS AND PHYSICAL SECURITY CONTROLS DURING OPERATIONS

- All employees, subcontractors and visitors will be required to sign in and out of attendance registers.
- There are two (2) access levels: (1) unescorted physical access for individuals authorized access to the Facility; and (2) visitor or guest access shall be deemed conditional access, under the supervision of someone with unescorted physical access, to perform limited services at the Facility.
 - A list of all individuals authorized for unescorted physical access shall be maintained by the O&M Site Manager.
 - Individuals needing unescorted physical access must be approved by the O&M Site Manager prior to having access.
 - Access records for all security perimeters shall be maintained by the O&M Site Manager
 - All unauthorized access to any security perimeter must be reported to the O&M Site Manager OCC and law enforcement when appropriate.

2.3 ADDITIONAL PHYSICAL SECURITY BOUNDARIES DURING OPERATIONS

- A physical perimeter fence that secures the array (PV generation equipment), substation, control building, and O&M building. Note that there is a possibility the site will not contain a control or O&M building.
 - A dedicated fence line protecting the substation from the rest of the array also encompasses the control building.
 - A physical building secured with locked doors protects shared facility controllers and SCADA equipment, including firewalls.

2.4 USE OF LOCKS

- Locks are required for all designated entry points of security perimeters. Physical doors with keyed locks may utilize combination boxes to control key access. Where feasible, locks are required for areas of the Facility where the control network is exposed.
- The O&M Site Manager will maintain a list of perimeter combinations, locks, and assigned keys.

- O&M Site Manager technicians will manage the process for assigning keys and providing escorted access.

2.5 SECURING BOUNDARIES

- O&M Site Manager & Technicians are responsible for securing all perimeter entry points for the Facility.
- Perimeter entry points should be secured at all times (e.g., gates should be closed and locked when not actively monitored).
- Potential perimeter security breaches should be reported to the O&M Site Manager OCC for evaluation.
- Damage to a security perimeter must be reported to the O&M Site Manager and remediated during repairs

3.0 SAFETY PROVISIONS & GUIDELINES

3.1 SITE ACCESS & ORIENTATION

- All personnel must complete prerequisite training to access the site to perform work.
- All personnel & visitors must complete site orientation prior to performing work or visiting on site.
- Some types of work at the Site will require specific safety training and have specific safety procedures unique to the work. For example, work involving isolating an energy source(s) will involve using the Lockout/Tagout (LOTO) Procedure.
- Visitors will be given a visitor's Site Orientation and must always be accompanied by a fully inducted person.
- Visitors are required to have their own safety boots and all other minimum PPE requirements may be loaned if the visitor does not have safety vest, safety glasses and hard hat.

3.2 FIRE RISK

- Fire extinguishers should be installed and maintained in tool containers, site offices, O&M building vehicles, construction areas and flammable storage areas and other areas as required.
- Complete EHS and Emergency Assessment to be performed during construction and regularly during operations.
- Site Orientation to include basic inspection, safe use and operation guidance of all relevant fire extinguisher types.
- An onsite register of inspection and maintenance of all fire extinguishers to be maintained.
- Regular maintenance of fire extinguishers is carried out in accordance with the OSHA requirements.
- Coordinate with local fire station prior to commencement of construction work on site; ensure that on days of total fire bans that either no naked flames or devices that could create a spark shall be used or if required to ensure that approval has been obtained and that the requirements of the permit are abided by.
- In the event of a fire beyond the control of portable extinguishers, the Supervisor shall evacuate personnel from the affected area(s) and call "911" to notify the fire department. The Supervisor shall notify the Project Superintendent and Regional Safety Manager.

3.3 PERSONAL PROTECTIVE EQUIPMENT & HARD HAT INSTRUCTIONS (PPE)

- Conduct training for workers/employees (during construction) and technicians (during operations) on the selection, use and care of PPEs.
- PPE should comply with OSHA requirements.
- Worker/employee/technician must demonstrate an understanding of training received and the ability to use PPE properly. If there is a reason to believe that any trained employee is not depicting the understanding and skill or there are changes in the workplace, the employee must be retrained. O&M Technicians to be trained annually.
- Maintain a clearance between the shell of the hard hat and the head for the protective system to work properly.

3.4 HOUSEKEEPING GUIDELINES

- Keep offices, yards, vehicles, and Facility neat and orderly at all times.
- Keep tools, equipment and materials orderly.
- Do not place tools and materials where they are likely to fall.
- Remove tools, equipment and materials from the work area if not to be used immediately.
- Promptly dispose of oily waste or rags brought in from the job site or found in the work area.
- Do not leave combustible or flammable material on vehicles.

3.5 STAIRWAY USE GUIDELINES

- Walk carefully; do not run up or down stairs.
- Take one step at a time using the handrails provided.
- Do not carry items that obscure vision.
- Do not carry liquids in open containers.
- Immediately report defective stairways to appropriate supervision.
- Install warning device for other users indicating the presence of identified hazards until repaired.

3.6 FIRST AID KITS

- A minimum of one first aid kit shall be located at the work site.
- During construction, contractors are required to provide a comprehensive Occupational First Aid

Kit relevant to their scope of work and risk.

- The location of the First Aid Kits is to be discussed during the Site Orientation.
- First Aid kits will be formally examined on a six-monthly basis by a First Aid trained person. This will be noted on the First Aid Kit Inspection Form. Where the eyes or body of any person may be exposed to injurious corrosive materials, emergency eye washing equipment shall be provided within the work area.

3.8 EMERGENCY & EXIT SIGNAGE

- Properly post and maintain emergency exit signs in work areas.
- Letter emergency exit signs with letters no smaller than 6 inches high with the principal strokes of letters not less than $\frac{3}{4}$ of an inch wide spelling the word "EXIT."
- Ensure emergency exit signs are illuminated in areas used after dark or in areas potentially absent of natural lighting.

4.0 INCIDENT MANAGEMENT

4.1 INCIDENT NOTIFICATION, REPORTING, AND INVESTIGATION

- All personnel, including Arevon and contractor employees are required to report all incidents, near misses, dangerous occurrences involving personal injury, environmental impact, or Site and equipment damage directly following the occurrence.
- Arevon has a clear incident reporting process and requires that all personnel be familiar with the reporting tool.
- Incidents shall be reported to the Site Authority, Site Manager or immediate supervisor immediately. The Site Authority/Immediate supervisor shall create a report and commence the appropriate investigation based on the potential category of the incident.
- It is the responsibility of the Site Authority, Project Manager or EHS lead to report and fully investigate the occurrence with the personnel involved with assistance from EHS.
- All reports are tracked for completion of action items to ensure identified controls are implemented through the reporting tool.
- To ensure opportunities to learn from incidents and communicate hazard control strategies, all hazards and incident reports are discussed in toolbox meetings and communicated to all relevant employees. The communication process is the responsibility of the Arevon Site Authority / Site Manager/ EHS Lead.
- The Project Manager or EHS Lead, in consultation with the EHS Lead, is responsible for reporting to the client on EHS matters within contractual requirements.

4.2 FIRST AID AND MEDICAL TREATMENT

- The Project Manager or EHS Lead, in consultation with the EHS Lead, is responsible for reporting all injuries (no matter how minor) to the Project Superintendent who may arrange for medical treatment at the designated medical facility. The Superintendent shall notify the Contractor's Regional Safety Manager when a worker is transported to an off-site medical facility.
- In the event of personal injury, the Supervisor may render first aid to the injured employee if:
 - the Supervisor is not subject to injury or illness.
 - the extent of the injury is not beyond the Supervisor's ability to render care; and
 - the Supervisor feels comfortable rendering first aid.
 - An AED will be available on site and a trained supervisor available at all times.
- If the injury requires medical treatment beyond first aid, the Supervisor shall transport the injured worker to an off-site medical facility.

- For all medical emergencies, the Supervisor shall dial 9-1-1 to notify emergency medical response. The Supervisor shall also notify the Project Superintendent and the Regional Safety Manager.

5 EMERGENCY RESPONSE INSTRUCTIONS AND COORDINATION

5.1 EMERGENCY PREPAREDNESS AND FIRST RESPONDERS

- The Site Emergency Action Plan is modified to be site specific and is incorporated by reference. The full program will be kept on the jobsite. Emergency contact information will be included in the plan as well as with each supervisor. All employees will be trained in how to report an emergency, the signal system to be used to notify them of an emergency, the shut down and evacuation procedures, and the assembly areas.

- Prior to construction, the project team will coordinate with local first responders to confirm the below information to be included as part of the Site Emergency Action Plan.
 - Site Address
 - Primary Construction/O&M Contact
 - Appropriate communication protocol for Fire/Sheriff/EMS
 - Fire Department contact information
 - Sheriff/Law Enforcement contact information
 - Medical Emergency/EMS contact information
 - Map or written directions to closest medical facility
 - Evacuation plan and assembly areas

- Set up necessary outreach and introduction of Site Manager/Construction Manager/Project Manager with first responders prior to commencing construction and as well as operations.

- The Emergency Action Plan shall include a map depicting the location of all access road entrances and their addresses or coordinates.