Pratt & Whitney
CT Operations

ENVIRONMENT, HEALTH & SAFETY GUIDELINES
For Level I CONTRACTORS

Revised October 2012
“Working Together for a Safer Environment.”

FACILITY PHONE NUMBERS

Pratt & Whitney

East Hartford
Emergencies, Medical/Fire/Spill 860-565-1111 (5-1111)
EH&S 860-565-3440 (5-3440)
Security 860-565-6615 (5-6615)
Fire Dept. 860-565-5907 (5-5907)

Middletown
Emergencies, Medical/Fire/Spill 860-344-5111 (5111)
EH&S 860-344-4411 (4411)
Security 860-344-4074 (4074)
Fire Dept. 860-344-4074 (4074)
The 2012 edition of the PW Guidelines for Contractors handbook has incorporated several new elements and requirements designed to assist PW in the implementation of best management practices to ensure the safety of our employees as well as the contractors working on behalf of Pratt & Whitney. We hope you will find this issue helpful and provide clear communication of the expectations and guidelines to meet our Contractor Safety Program goals and initiatives.

In particular, you will find all new requirements established from recently promulgated regulatory standards as well as Pratt & Whitney procedural requirements highlighted to emphasize these points. If you have any questions regarding any information contained within this document please contact your contractor coordinator or the Pratt & Whitney Contractor Program Manager.

We appreciate your cooperation and commitment to making Pratt & Whitney a safe place to work.

Sincerely,

Brian J. Blondin

Brian J. Blondin
PW Contractor Program Manager
Connecticut Operations

Updates to the handbook between annual printings will be posted on the intranet at the EHS Guidelines for Contractor Handbook link at www.pw.utc.com/contractorehs. Contractors should visit this page upon their initial clearance to work at a Pratt & Whitney facility, and periodically thereafter.
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Pratt & Whitney’s Environment, Health & Safety Policy

Pratt & Whitney will not be satisfied until its workplace is safe from hazards, its employees are injury-free, its products and services are safe, and its commitment and record in compliance, pollution prevention, and protection of the natural environment are unmatched.

Objectives
• Eliminate all employee injuries and ill health by making the workplace free from hazards and unsafe actions.
• Drive pollutants in manufacturing processes to the lowest achievable levels.
• Conserve natural resources in the design, manufacture, use and disposal of products and delivery of services.
• Comply with safety and environmental protection standards, applicable laws, and company policies and go beyond, when necessary, to achieve our goals.
• Hold operating managers accountable for safety and environmental performance and for providing leadership and required resources.
• Require all employees to support the policy and objectives.
• Continually improve EH&S management and performance.

The purpose and scope of the UTC Standard Practice 10, Contractor EH&S Program, is to regulate the activities of contractors who perform work on-site at UTC’s operating units.
Contractor EHS Requirements

Contractors are responsible for ensuring their employees, subcontractors and agents comply with this EH&S Guide and applicable Federal, State and Local regulations at all times during performance of their work.

- Each contractor will complete a Contractor EH&S Assessment pre-qualification questionnaire. The pre-qualification process will identify contractors, vendors and service providers who have effective Environment, Health and Safety (EH&S) programs with demonstrated leadership and performance in their industry.

- P&W reserves the right to verify that the Contractor and all of the Contractor’s employees meet contractual requirements, including orientation, training, medical testing and substance abuse screening.

- The Contractor EH&S Program at P&W is administered in English. The Program includes this Guidelines for Contractor Handbook, online computer training, and a Contract Coordinator who will provide project management and supervision.

- Contractor employees who will be issued a picture badge or act in a supervisory role in the performance of their duties at PW, must first complete Contractor Online EH&S Training. This training covers the PW requirements in this handbook, and includes a test to verify comprehension. Information on how to take this training is available from EH&S, your Contractor Coordinator or Emergency Services.

- All contractors must communicate in English with the level of proficiency necessary to ensure the safety of their employees and the safety of others.

- Contractor activities and performance will be audited and evaluated through the Contractor EH&S Progressive Improvement Plan to ensure ongoing compliance with P&W policies, procedures and requirements, and to achieve a successful and injury-free workplace.

- Contractor employees may be required to sign a contractor verification card supplied by Plant Protection.

- Each contractor employee must carry the card with them at all times, as it is required in order to enter the facility through the security post.
• A P&W Contractor Coordinator will be assigned for each project. The Contractor Coordinator will be the Contractor's primary P&W contact on all matters related to the task.

• If there are any questions about this Guidelines for Contractor Handbook or any EH&S concerns related to an operation or activity, contact your supervisor or the P&W Contractor Coordinator.

• The requirements of this Guidelines for Contractor Handbook are in addition to the terms and conditions of any Agreement or Purchase Order between the Contractor and P&W and form a material part thereof.

• Contractors will conduct safety meetings with their employees to cover all applicable sections of this Guidelines for Contractor Handbook before any work is done on PW property.

• Copies of this EH&S Contractor Guidelines for Contractor Handbook are available from Environmental, Health & Safety (EH&S), and Plant Protection and at the P&W Contractor EH&S Website.

Each contractor shall:

• Have ready access to this Guidelines for Contractor Handbook at all times to use as a reference source.

• Report all injuries, spills and near hits immediately to Emergency Services and your Contractor Coordinator.
Definitions

BAER (Business Area Export Representative): P&W employee who has been appointed by his/her manager to obtain import-export compliance training and to act as his/her department’s export-import compliance point of contact.

Contractor Coordinator – The P&W employee who is directly responsible for the activities performed on site by a contractor and the contractor’s employees and subcontractors.

Foreign National: A foreign national is any person, firm, or other entity that is not a U.S. citizen, permanent resident alien, or asylee. A U.S. citizen who works for a foreign company is considered a foreign national. All foreign nationals working in the U.S. are treated as foreign nationals. Foreign nationals employed by Pratt & Whitney are treated as if they are receiving exported information. Exports to foreign nationals are treated as if the export is made to their country of citizenship. Note: An individual who has permanent resident alien status (holds a U.S. “green card”) or who is a political asylee or refugee, is not a foreign national, and is treated as a U.S. person, for purposes of the export regulations.

Level I Contractor: Any other person performing work, or providing services who does not meet the definition of a level II or level III contractor service. Examples of level I contractors are credit union employees, office equipment repair personnel, cafeteria personnel, office staff, external auditors, etc.

Note: Level I Contractors are not permitted to perform work on the shop floor

Level II Contractor: Contractors whose services require them to work in the shop or other potentially hazardous work areas (e.g., process engineering consultants, equipment engineers, original equipment manufacturer service contractors) or delivery personnel who engage in material handling activities. Level II contractors do not perform “trades” type work (e.g., electrical, pipefitting, mechanical).

Level III Contractor/ Projects: Contractors and projects that involve trades type work such as general contractors, construction vendors, riggers/millwrights, painters, machine tool services vendors, and other vendors who use power tools and/or are engaged in activities that involve potentially hazardous chemicals or energy sources.
Minor Incident – An incident (violation) that is not severe enough to be defined as a serious incident.

Protective Services: Includes PW Fire Department, PW Security Department.

Review Board – The Contractor Review Board consist of the Site EH&S Managers, Facility Manager, and Contractor Administrator. The Contractor Review Board will review all contractor incident reports and assign corrective action points. Assigned points will be determined by the board based on the nature and circumstances of the incident or violation.

Serious Incident – An incident that results in an OSHA recordable injury, an environmental release that is deemed by the EH&S department to be a danger to human health or the environment, or property damage in excess of $1000.00, including incidents that meet policy 33 & 52 reporting requirements.

Shelter-In-Place Location: An area within a building that should be with few doors and windows and away from exterior walls of the building. Area should be large enough for everyone in the designated area and have access to water supply, bathroom facilities and communications.

Site – Location of a P&W facility where work is performed.
Contractor EH&S Performance Progressive Improvement Plan

Point Assessments
Minor Violation: 1 point
Serious Violation: 2-6 points (applied to Cardinal Rule violations)
Category Points: Violations within the same chapter of this handbook (e.g., Lockout Tagout, Confined Space, PPE)
Total Points: Total of all violations, regardless of category.

<table>
<thead>
<tr>
<th>Category Points*</th>
<th>Total Points*</th>
<th>Division Improvement Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td>Verbal Warning to Work Crew and Contractor</td>
</tr>
<tr>
<td>2</td>
<td>4</td>
<td>Written Warning to Contractor</td>
</tr>
<tr>
<td>3</td>
<td>6</td>
<td>Contractor Meeting with site Review Board</td>
</tr>
<tr>
<td>4</td>
<td>15</td>
<td>Work Crew¹ Suspended from site for 1 week and Contractor Suspended from bidding jobs at the site/division² for 6 weeks</td>
</tr>
<tr>
<td>5</td>
<td>20</td>
<td>Work Crew and Contractor suspended from site for 3 months</td>
</tr>
<tr>
<td>6</td>
<td>25</td>
<td>Contractor suspended from site indefinitely</td>
</tr>
</tbody>
</table>

* - For violations/incidents within the last 24 months.
1 - Alternate work crew may be assigned to continue work
2 - Site or division suspension determined by review board

<table>
<thead>
<tr>
<th>UTC-Wide Consequences*</th>
<th>Improvement Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Divisional Suspension</td>
<td>Written Warning¹ to Contractor Management</td>
</tr>
<tr>
<td>2 Divisional Suspensions</td>
<td>12 Week UTC Bid Suspension</td>
</tr>
<tr>
<td>3 Divisional Suspensions</td>
<td>1 Year UTC Bid Suspension</td>
</tr>
<tr>
<td>4 Divisional Suspensions</td>
<td>Permanent UTC Site and Bid Suspension</td>
</tr>
</tbody>
</table>

* - For suspensions within the last 24 months. A suspension at any division initiates the UTC-wide Improvement Action
1 - Including warning that Contractor is at risk of UTC-wide bid suspension

The intent of this plan is to raise the level of awareness concerning poor EH&S performance to succeeding levels of management within a contractor's organization, and thereby enabling management to implement necessary corrective actions to avoid future violations and business interruptions.
Security and Identification

PW Security (Identification) Services will clear contractors prior to their first day of work at P&W. Contractors must contact the Security (Identification) Services department or their Contractor Coordinator at each P&W facility to determine what (if any) restrictions apply to individual personnel. Contractors must do this in advance of assigning personnel to work on or within a P&W property or facility. Contractor personnel may be required to provide government-issued documents confirming their eligibility to access security, export controlled, or other sensitive areas of P&W's facilities. P&W reserves the right to deny access to contractor personnel who are unwilling or unable to meet U.S. Government or P&W requirements.

- All persons visiting the site will register at their entry and exit points in accordance with site requirements as specified by the Contractor Coordinator.
- Contractors will display their One-Day Contractor Badge or Picture badge at all times.
- Contractors will report the loss of a contractor picture badge immediately to Security Services.
- Unless otherwise authorized by the Contractor Coordinator, contractors are accountable for all employee badges.
- Firearms and weapons are prohibited unless authorized by the Emergency Services/Security Manager.
- Portable radios, tape decks, television sets are prohibited, unless authorized by Contractor Coordinator. Camera and video equipment (including cell phones with digital camera capability) require a PW pass, which must be displayed at all times if issued.
- Contractor employees will be restricted to the area in which they are working.
- All packages, equipment and vehicles are subject to inspection by Emergency Services.
- Contractors admitted to company property must conduct themselves in an orderly and safe manner. Fighting, engaging in horseplay,
being under the influence of or possessing alcohol or drugs, gambling, soliciting, stealing, immoral or otherwise undesirable conduct is not permitted.

- Contractor vehicles will be parked only in areas designated by the Contractor Coordinator or by Emergency Services. After unloading tools or equipment, contractor vehicles must be relocated to their designated parking area.

- Authorization must be obtained from the Contractor Coordinator for any access to P&W property before 7 am or after 5 pm (weekdays) or on weekends/holidays.

- **Failure to comply with security procedures is cause for termination of contractor privileges.**

P&W reserves the right to request a copy of the contractor’s hazard control programs, training certificates, injury logs or other EH&S-related program documentation in order to substantiate compliance with various regulatory requirements.
Housekeeping and Sanitation

- Restrooms are provided throughout the facility. Your Contractor Coordinator will direct you to the nearest restroom location.
- Never leave file cabinet or desk drawers open more than one drawer at the same time.
- Do not lay electrical cords across aisles or walkways.
- Report slipping or tripping hazards immediately to the area supervisor or Contractor Coordinator.
- Do not store hazardous materials in office areas without approval from EH&S.

**Portable Space Heaters**

- Requests must be submitted in writing upon evaluation of the workspace.
- Only PW Approved Space Heaters are permitted
  - Wattage shall be equal to or less than 200 watts. Voltage shall be 120VAC.
  - Surface temperature should not exceed 200°F
  - There shall be no exposed glowing elements.
  - Space Heater shall have an automatic tip-over shutdown feature
  - A thermostat control shall be used. Unit must be UL (Underwriters Laboratory) approved, or equivalent, and labeled accordingly.
  - Portable space heater may be purchased through Bruckner supply.

**Operational requirements:**

- GFCI protection is required for all space heaters
- The space heater must be kept free from combustibles (e.g. paper, coats, scarves, drapery, recycling bins, wastebaskets, etc.)
- The space heater must be turned off when the desk is not occupied and at the end of the day.
- The space heater must be plugged into an electrical outlet. Power strips or extension cords are not allowed.
- All of the plugs in the space heater system must be three pronged
Emergency Response and Notification

Fires

In the event of a fire, locate and pull the nearest fire pull box or call the emergency number specific to the site you are working. This will communicate the fire emergency directly to the dispatcher.

Do not attempt to extinguish a fire yourself, unless you are trained and qualified to operate a fire extinguisher.

Evacuation

Evacuations are indicated by an audible signal followed by a specific announcement over the public address system. It is essential that all evacuation instructions be adhered to.

Exit quickly and in an orderly manner.

Your Contractor Coordinator will review evacuation routes and assembly areas with you.

Proceed to the nearest safe exit or shelter in place location in an orderly manner. DO NOT rush, push, stop, or attempt to retrieve personal items that are not in your immediate area.

When exiting a building, go to the nearest assembly area and standby for further instructions. Follow the sweeper’s instructions.

DO NOT attempt to re-enter the evacuated area until you are directed to do so by a uniformed P&W Protective Services representative or sweepers who have been directed by P&W Incident Command

Evacuation Guidelines

Spills and Releases - Listen to the PA announcement. Directions will be either for evacuation or shelter in place. If the release is in the facility one or more buildings could be evacuated to the exterior. Once this has been established, employees should move to their exterior assembly areas. If the release is outside the facility, you will be told to remain in the building or move to your shelter in place location. Remain indoors until the Incident Command has determined that it is safe to leave the building.
**Bomb Threats** - Listen to the PA announcement or for direct instructions from Protective Services. Directions will either be for evacuation or shelter in place.

**Suspicious Packages/Powders** - Listen to the PA announcement or for direct instructions from the Protective Services. Directions will either be for evacuation or shelter in place.

**Suspicious/Dangerous Person** - **Self Evacuate**, if safe to do so. Leave the building and seek cover. If you cannot safely evacuate, **Hide Out**. Hide in areas out of view of the dangerous person. Lock or block entry to your hiding space. Lay on the floor under desks or similar spaces. **Take Action** as a last resort and only when your life is in imminent danger. Attempt to incapacitate the dangerous person. Act with physical aggression, do not try and talk to them.

**Active Shooter** - **Self Evacuate**, if safe to do so. Leave the building and seek cover. If you cannot safely evacuate, **Hide Out**. Hide in areas out of view of the active shooter. Lock or block entry to your hiding space. Lay on the floor under desks or similar spaces. **Take Action** as a last resort and only when your life is in imminent danger. Attempt to incapacitate the active shooter. Act with physical aggression, do not try and talk to them.

**Explosion** - Listen to the PA announcement. Directions will either be for evacuation or shelter in place. If the explosion is internal to the facility one or more buildings could be evacuated. Once this has been established, employees will move to their exterior assembly areas. If the explosion is outside of the facility, you will be told to remain in the building or move to your shelter in place location. Remain indoors until Incident Command has determined that it is safe to leave the building.

**CBRNE** (Chemical, Biological, Radiological, Nuclear and Enhanced Conventional Weapons) Listen to the PA announcement. Directions will either be for evacuation or shelter in place. If the event is internal to the facility one or more buildings could be evacuated. Once this has been established, employees will move to their exterior assembly areas. If the event is outside of the facility, you will be told to remain in the building or move to your shelter in place location. You will remain indoors until Incident Command has determined that it is safe to leave the building.

**Tornado** - Listen to the PA announcement for directions. Prior to the storm hitting you will be asked to move to your shelter in place location. After the event, listen for instructions. If your building has been damaged, you are to proceed to your outside assembly area and await further
instructions. Be aware of your surroundings and avoid hazards such as live electrical, debris and similar hazards

**Hurricane** - Listen to the PA announcements if on site or local news on TV or radio for instructions on coming into work. Prior to the storm hitting you will be asked to move to your shelter in place location. After the event, listen for instructions. If your building has been damaged, you are to proceed to your outside assembly area and await instructions. Be aware of your surroundings and avoid hazards such as live electrical, debris and similar hazards

**Earthquake** - Do not evacuate the building during the earthquake. If possible, move to your shelter in place. Do not go up or down stairs. If you cannot move to your shelter in place, move away from windows, tall objects that can fall over and similar hazards. Get under a desk or table and hang onto it, or move into a hallway or get against an inside wall. If you are outside of a building, get into the open, away from power lines, light poles or anything else that could fall on you. Once the event is over, determine if there is any damage to the building you are in. Look for broken windows, cracks in the walls, fallen ceiling panels, electrical power outage and similar items. Call (860-56)5-1111. If an evacuation is necessary, it will be announced over the PA.

**Injuries**

In the event of an injury or illness, dial the site-specific emergency phone number from any internal P&W phone.

Provide the dispatcher with the following information:

- Nature of emergency (injury, spill, fire)
- Location (department name/number, building letter, column number)
- Your name and the name of the company for which you work.

Only properly trained P&W emergency response personnel are qualified to clean up injury sites involving body fluids.
Spills

Chemicals may not be disposed of by dumping on the ground or into sanitary or storm drains.

A spill is defined as an accidental release of any product, including water, outside of its normal container except during use.

There is no minimum to the quantity that defines a spill.

All spills, including those that occur outside a building, shall be reported immediately by dialing the emergency response number applicable to the site where you are working and providing the dispatcher with the following information:

- Nature of emergency (injury, spill, fire)
- Location (department name/number, building letter, column number)
- Your name and the name of the company for which you work.
- Identity of material spilled/released
- Quantity of material spilled/released
- Time of the spill

Contractors shall be responsible for all spills that result from their work at any P&W facility. However, the contractor cannot start cleaning up the spill until Emergency Services has authorized them to do so, unless failure to do so immediately poses an imminent risk to human health or the environment,

If P&W determines that a spill clean-up is beyond the contractor’s ability, or the contractor has failed to clean up the spill adequately, P&W shall use its own personnel or hire spill clean-up specialist.

In all cases, the contractor shall be responsible for all costs. These costs may include removal of contaminated materials as well as restoration of the area.
Injury and Illness
Recordkeeping and Reporting

Contractors shall immediately notify their Contractor Coordinator or P&W Supervisor of any injury, illness and any loss of or damage to P&W property, including incidents related to their subcontractors.

Contractors shall collaborate with the Contractor Coordinator or P&W Supervisor in the incident investigation and root cause corrective action implementation.

An investigative report assessing the root cause and corrective action shall be submitted within 24-hours of the incident's occurrence to the Contractor Coordinator.

Any unsafe conditions and activities shall be reported to the Contractor Coordinator or P&W Supervisor and corrected immediately.

In the event a contractor requires medical attention for a work-related or potentially work-related injury or illness, or periodic medical evaluations, the contractor must use the clinic selected by his or her company. The Pratt & Whitney onsite medical clinics provide clinical evaluation and treatment to contractors in the following situations only:

- FAA mandated testing (e.g. drug and alcohol testing)
- In emergency medical situations when not transported directly offsite by the fire department/plant protection
- Hydrofluoric Acid (HF) exposure
The Contractor Coordinator accompanied by the contractor must formally investigate all incidents, injuries and spills, including near misses, in order to prevent reoccurrence. For all incidents:

- Secure the area with barricades/caution tape to preserve the scene.
- Perform a walk-through of the incident site; this may occur with Site EH&S personnel as well as the Contractor Coordinator.
- Interview witnesses, where applicable.
- Take pictures and/or create a diagram of the incident site.
- Submit a written incident investigation report to the Contractor Coordinator, within 24 hours of the incident occurrence.
- The report shall describe the incident and identify root cause and corrective actions, along with a timetable for implementing the corrective actions.
- With the assistance of the Contractor Coordinator, an internal divisional incident report will be completed for all incidents that result in a recordable injury, environmental release deemed hazardous by the Environmental Health and Safety department, or significant property damage.
Training

- Contractors shall instruct each of their employees and sub-contractors in the recognition and avoidance of unsafe conditions and of the regulations applicable to his/her work environment to control or eliminate any hazards or exposure to illness or injury.

All contractors and their subcontractors performing jobs on a P&W premises shall ensure that all of their employees assigned to perform work have been properly trained to the OSHA regulations applicable to the hazards associated with the work they will perform prior to permitting the employee(s) to begin work.

- Training may include, but is not limited to, on-the-job (OJT) training, tool box sessions, internal or external formal training, etc. The training must meet the minimum criteria set forth by the state, federal, national, provincial, and local requirements regarding the specific subject matter.

- Contractors are required to work to the most stringent applicable sections of OSHA 1910 and 1926 at a minimum. The rules and requirements covered in this *Guidelines for Contractor Handbook* are not all inclusive and there may be additional requirements specific to a project or task. Copies of OSHA standards can be obtained from OSHA’s web site [http://www.osha.gov](http://www.osha.gov).

- Contractor(s) and subcontractor(s) shall maintain, on the P&W premises, a summary of training information depicting the training/certification/licensure as required for all employees assigned to perform work on the project. Form is available on the internet at [http://links.pw.utc.com\contractorehs](http://links.pw.utc.com\contractorehs) via the Pratt & Whitney link.

- Actual documentation of training is subject to review upon request by P&W. Examples of actual training documentation include class rosters, toolbox notes and attendance, certificates, official letter of completion, etc.
# Motor Vehicle Safety

- Contractor employees shall park their personal vehicles only in those areas designated by P&W Emergency Services or the Contractor Coordinator. P&W assumes no responsibility for vehicles, or articles in vehicles, parked on P&W property.

- Vehicles and equipment shall not block exits, walkways, loading areas, fire hydrants or emergency equipment.

- Contractors will not perform extensive maintenance or repairs of vehicles while on PW property.

- Drivers shall obey all traffic regulations and signs, and carry a current driver's license for any vehicles they operate.

- Drivers shall not use mobile phones while operating vehicles on company property.

- All vehicles are subject to inspection when entering or leaving the location.

- Mobile sources (i.e. delivery vehicles, construction equipment, security vehicles, and even personal vehicles) cannot idle for more than 3 consecutive minutes when not in motion.

  - Idling is only allowed during the following:

    - Vehicle is motionless due to traffic conditions
    - Mechanical difficulties
    - Operation of defrosting equipment, heating or cooling equipment
    - Operate auxiliary equipment that is located in or on the vehicle (e.g. crane operation, lift gate operation)
    - When the outside temperature is below 20°F
    - The vehicle is undergoing maintenance
      To warm the engine up to manufacturer's recommended operating temperature

- Drivers shall be mindful of pedestrian traffic at all times.

- All accidents will be reported immediately to the site emergency number.
Personal Protective Equipment

- Contractors shall furnish and require the use of personal protective devices and equipment (PPE) by their employees and by their subcontractor employees.

Minimum PPE Requirements:

- Safety glasses with side shields that meet the specifications of ANSI Z87 shall be worn throughout the manufacturing facility and in outdoor work areas.

- Tinted safety glasses are not permitted indoors, unless needed for the job hazards.

Protective Footwear

Due to the various hazards in shop areas and the different types of shop floor material, footwear worn in shop areas must:

- be closed toe
- be closed heeled
- have a substantial sole (e.g. no moccasins)
- have a maximum heel height of 2.5 inches, including the sole
- have a minimum heel floor contact dimension of 1.5 inch by 1.5 inch
EXPORT COMPLIANCE

All Pratt & Whitney employees, contractors, and third parties within the U.S. are subject to U.S. export laws and regulations.

It is essential that all contractor personnel understand and comply with all elements specified by the PW International Trade Compliance group.

**Watchlist Screening:**

Watchlist Screening refers to the process of determining whether parties to a potential transaction with P&W are listed on various “watchlists” established by the U.S. Government.

**MK denial reviews:**

All contractor personnel will be subject to review by PW using MK Denial for inclusion on the Denied Persons list. This will be performed initially and on an annual basis.

- Prior to granting access to P&W facilities, network, data, software, or commodities
- Prior to being enrolled in P&W-provided training

**Access Controls:**

The U.S. Government prohibits foreign nationals from having access to certain "technical data" or controlled commodities without a specific export license. "Access" means any contact with technical data via visual, oral, or other means. This includes receipt or review of documentation, briefings, plant tours, etc. Electronic transmission of technical data to a foreign national via facsimile or electronic mail is subject to export restrictions.

Contractor employees shall obtain proper authorization from their contractor coordinator and or PW supervisor prior to accessing badge controlled areas.

Contractor Employees shall not tailgate another employee to gain access to a badge controlled area that they have not previously been authorized to enter.
Export Controlled Areas

Export controlled areas are restricted to US Persons only and or US Person escort and are marked with the following sign.

Photographic equipment:

- Camera and video equipment (including cell phones with digital camera capability) require a PW pass, which must be displayed at all times if issued.
- Photographs/video shall not be taken of any data, equipment or process unless authorized in advance.
- All publications/presentations or documents that contain photographs shall be reviewed by a BAER prior to distribution.

Technology control

If a Foreign National Contractor requires access to technology or a controlled technology area, the sponsor must coordinate in advance with the appropriate Business Unit Export Manager and ITC to obtain an approved Technology Control Plan. Please note that creation and approval of this plan can take several weeks. Please note that one component of obtaining an approved plan is to have an approved Non-disclosure agreement between the FN Contractor and PW.

Visitor Registration

All visitors to Pratt & Whitney's facilities must be registered in the Visitor Registration System. This includes U.S. persons, permanent resident aliens (ie “green card” holders), and non-U.S. persons.