

# JACKSON TELECOM LLC

## Health, Safety & Environmental Manual Addenda for SQUAN Subcontractor Pre-Qualification

<b>Document Type</b>	HSE Manual Addenda (Supplement to Final Prime Version)
<b>Prepared For</b>	SQUAN Construction Services, LLC – Subcontractor Onboarding
<b>Company</b>	Jackson Telecom LLC
<b>Owner / Operations Manager</b>	Ronald Jackson
<b>Phone</b>	404-343-5618
<b>Email</b>	jacksontelcomllc@gmail.com
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**Purpose:** This addenda supplements the Jackson Telecom LLC Health, Safety & Environmental Manual (Final Prime Version, Effective 5/3/26) to fully address the subcontractor obligations in the SQUAN Construction Services, LLC Master Subcontractor Agreement ("MSA") and Exhibit A. Each addendum item below carries an **Integrates With** callout identifying the section of the original HSE Manual it supplements or modifies. A master Integration Map (Addendum H) on the page following the Table of Contents provides a single-page reference. These addenda are incorporated into and enforced as part of the primary HSE Manual. Where any conflict exists, the most stringent requirement applies.

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## ADDENDUM H

### Master Integration Map

The table below shows where every item from these Addenda integrates into the primary Jackson Telecom HSE Manual (Final Prime Version, Effective 5/3/26). Items marked **"INSERT REFERENCE"** belong inside an existing manual section — the section text already covers the topic at a high level, and the addendum provides the depth, frequency, or specific procedure required by SQUAN. Items marked **"NEW STAND-ALONE"** do not have a logical home in the existing manual and should remain in the Addenda (or be added as a new numbered section in a future revision).

Addendum Item	Integrates With Original Manual	Type
A.1 Permit to Work / LOTO	Section 11 – Electrical and Power Line Safety	INSERT REFERENCE
A.2 Confined Space Entry	Section 16 – Underground Work and Utility Locates	INSERT REFERENCE
A.3 Respiratory Protection	Section 23 – Hazard Communication / WHMIS (and Section 8 PPE)	INSERT REFERENCE
A.4 Compressed Gas Cylinders	Section 20 – Tools, Equipment, Owned/Leased Materials	INSERT REFERENCE
A.5 Powered Industrial Vehicles	Section 13 – Bucket Truck / Aerial Lift Safety	INSERT REFERENCE
A.6 Highly Hazardous Chemicals / Explosives	Section 23 – Hazard Communication / WHMIS	INSERT REFERENCE
A.7 Medical Examinations	Section 27 – First Aid Procedures	INSERT REFERENCE
A.8 Hearing Protection / Noise	Section 8 – PPE Program	INSERT REFERENCE
A.9 Electrical Equipment Grounding Assurance	Section 11 – Electrical and Power Line Safety	INSERT REFERENCE
B.1 Management of Change (MOC)	Section 7 – Job Safety Analysis (JSA) Program (companion procedure)	NEW STAND-ALONE
B.2 Root Cause Analysis (RCA)	Section 31 – Incident Reporting and Investigation	INSERT REFERENCE
C.1 Daily Reporting (SOT, Dailies, JSA)	Section 32 – Safety Meetings; Section 4 – Supervisor Responsibilities	INSERT REFERENCE
C.2 BBS Hazard Reporting	Section 33 – Subcontractor Compliance; Section 5 – Employee Responsibilities	INSERT REFERENCE
C.3 Tower Certification of Personnel	Section 12 – Aerial Construction Safety	NEW STAND-ALONE

C.4 SQUAN Orientation / Pre-Job Meetings	Section 31 – HSE Orientation and Training	INSERT REFERENCE
C.5 Drug & Alcohol Alignment with SQUAN	Section 30 – Drug and Alcohol Program	INSERT REFERENCE
C.6 Stop-Work Authority / Right of Removal	Section 1 – OSHA Compliance and Safety Policy	INSERT REFERENCE
C.7 Worksite Restoration / Cleanup	Section 9 – Job Site Safety and Housekeeping	INSERT REFERENCE
D.1 Background Check Program	NEW SECTION – sits between Sections 30 and 31	NEW STAND-ALONE
D.2 Project Manager Designation	Section 2 – Roles and Responsibilities	INSERT REFERENCE
D.3 Licenses, Permits, Certificates	Section 1 – OSHA Compliance and Safety Policy	INSERT REFERENCE
D.4 EEO / Affirmative Action	Section 1 – OSHA Compliance and Safety Policy	INSERT REFERENCE
D.5 Borrowed/Rented SQUAN Equipment	Section 20 – Tools, Equipment, Owned/Leased Materials	INSERT REFERENCE
D.6 SQUAN/Customer-Supplied Materials	Section 20 – Tools, Equipment, Owned/Leased Materials	INSERT REFERENCE
D.7 Toxic/Hazardous Materials on Customer Premises	Section 23 – Hazard Communication / WHMIS	INSERT REFERENCE
D.8 Use of Lower-Tier Subcontractors	Section 33 – Subcontractor Safety Compliance	INSERT REFERENCE
D.9 Lower-Tier Subcontractor HSE Selection	Section 33 – Subcontractor Safety Compliance	INSERT REFERENCE
D.10 Drug & Alcohol Return-to-Work Testing	Section 30 – Drug and Alcohol Program	INSERT REFERENCE
D.11 First Aid / On-Site Medical Services	Section 27 – First Aid Procedures	INSERT REFERENCE
D.12 Trades and Crafts Certifications List	Section 31 – HSE Orientation and Training	NEW STAND-ALONE
D.13 Equipment Acquisition HSE Specifications	Section 20 – Tools, Equipment, Owned/Leased Materials	INSERT REFERENCE
D.14 "Non-Approved" Status Acknowledgment	Section 33 – Subcontractor Compliance (companion to MSA Section 2(c))	NEW STAND-ALONE
E.1 HSE Meeting Frequencies	Section 32 – Safety Meetings and Toolbox Talks	INSERT REFERENCE

E.2 Inspection and Audit Frequencies	Section 37 – Internal HSE Inspections, Audits, and Corrective Actions	INSERT REFERENCE
E.3 Equipment Inspection Frequencies	Section 20 – Tools, Equipment, Owned/Leased Materials	INSERT REFERENCE
F. Cross-Reference Matrix	Audit aid only — no original manual location	NEW STAND-ALONE

**Reading the callouts:** Every item in Addenda A through E carries a yellow **INTEGRATES WITH ORIGINAL HSE MANUAL** callout box at the top of the item, repeating the mapping above for at-a-glance reference during SQUAN's review.

## ADDENDUM A

### Programs Not Currently Applicable & Conditional Stop-Work Procedures

Jackson Telecom LLC's primary scope consists of fiber optic construction, aerial fiber placement, underground fiber installation, fiber pulling, fiber splicing, bucket truck operations, and related telecommunications field services. Certain specialized hazard programs are not currently part of routine Jackson Telecom operations but may be encountered on SQUAN job sites. This addendum documents Jackson Telecom's written stance on each such program, the trigger conditions that would require activation, and the stop-work procedure that applies if a trigger condition occurs unexpectedly in the field.

#### A.1 Permit to Work / Lockout-Tagout (Isolation of Energy)

**INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 11 (Electrical and Power Line Safety) of the original HSE Manual. Insert a reference: "For LOTO and energy isolation, see Addendum A.1."

Jackson Telecom does not perform work on energized electrical systems and does not service equipment requiring lockout-tagout under 29 CFR 1910.147. Crews work near, but do not interact with, energized utility lines. If a Jackson Telecom task is identified that would require de-energization, isolation of stored energy, or LOTO procedures, work shall stop, the SQUAN project manager shall be notified, and the task shall either be reassigned to a qualified electrical contractor or performed only after a written, site-specific LOTO permit and procedure is established with the controlling utility or facility owner. Jackson Telecom personnel shall not place, remove, or rely on locks/tags applied by other parties without verification by a qualified person.

#### A.2 Confined Space Entry

**INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 16 (Underground Work and Utility Locates) of the original HSE Manual. Section 16 already mentions confined-space hazards; this addendum is the formal program.

Jackson Telecom does not currently perform permit-required confined space entry. Routine work in handholes, vaults, and pedestals is performed without bodily entry where possible, using reach tools, fish tape, blowing equipment, and external splicing trailers. If a job requires bodily entry into a space meeting the OSHA definition of a permit-required confined space (29 CFR 1910.146), work shall stop immediately and the SQUAN project manager shall be notified. The space shall not be entered until: (a) atmospheric testing has been performed by a qualified person, (b) a written entry permit is in place, (c) an attendant and rescue plan are established, and (d) Jackson Telecom either subcontracts the entry to a qualified confined-space contractor or trains and equips its personnel to OSHA standards before entry.

#### A.3 Respiratory Protection

**INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 23 (Hazard Communication / WHMIS) and Section 8 (PPE Program) of the original HSE Manual. Insert a reference in both sections.

Jackson Telecom's standard scope does not generate airborne contaminants requiring respiratory protection under 29 CFR 1910.134. If a task is identified that may involve respiratory hazards (work in dust-generating environments, work near silica-bearing soil during boring, mold or sewage exposure in vaults, or use of solvents in poorly ventilated spaces), work shall stop until a written respiratory protection program is in place, employees have been medically cleared and fit-tested for the appropriate respirator, and training has been documented. Voluntary use of filtering facepieces (dust masks) for nuisance dust is permitted in accordance with 29 CFR

1910.134 Appendix D.

#### A.4 Compressed Gas Cylinders

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 20 (Tools, Equipment, Owned/Leased Materials) of the original HSE Manual. Insert a reference under the equipment list.

Jackson Telecom does not routinely use compressed gas cylinders in fiber operations. If cylinders are introduced to a Jackson Telecom site, they shall be: secured upright, capped when not in use, stored away from heat and ignition sources, transported in approved racks, and handled only by trained personnel. Cylinders shall not be used near energized equipment or in confined areas without ventilation review.

#### A.5 Powered Industrial Vehicles (Cranes, Forklifts, Etc.)

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 13 (Bucket Truck / Aerial Lift Safety) of the original HSE Manual. Section 13 covers bucket trucks; this addendum extends coverage to cranes/forklifts.

Jackson Telecom does not currently own or operate cranes, derricks, or forklifts. Bucket trucks and aerial lifts are addressed in Section 13 of the primary HSE Manual. If a project requires crane or forklift work (setting heavy reels, placing splice cabinets, staging materials), Jackson Telecom shall: (a) hire a qualified, certified operator and rigging crew with documented training under 29 CFR 1926 Subpart CC (cranes) or 29 CFR 1910.178 (forklifts), (b) verify operator certification and equipment inspection records before work, and (c) include the lift plan in the daily JSA.

#### A.6 Highly Hazardous Chemicals, Explosives, and Blasting Agents

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 23 (Hazard Communication / WHMIS) of the original HSE Manual.

Jackson Telecom does not handle, store, transport, or use highly hazardous chemicals as defined in 29 CFR 1910.119, nor does it use explosives or blasting agents. If a scope of work introduces such materials, the work will be subcontracted to a qualified specialty contractor with the appropriate written program, permits, and regulatory approvals. Jackson Telecom personnel will not perform such work under any circumstances.

#### A.7 Medical Examinations

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 27 (First Aid Procedures) of the original HSE Manual. Pairs with Addendum D.11 which describes on-site medical services.

Jackson Telecom does not currently require routine pre-placement, pulmonary, or respiratory medical examinations for the standard scope of fiber optic construction work. If Jackson Telecom is assigned to a project that requires medical examinations (respirator use under 1910.134, hearing conservation under 1910.95 if exposure is documented above the action level, or client-specific medical requirements), affected employees will be examined by a Physician or Other Licensed Health Care Professional (PLHCP) before assignment, and records will be maintained per 29 CFR 1910.1020.

#### A.8 Hearing Protection / Noise Exposure

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 8 (PPE Program) of the original HSE Manual. Section 8 already lists hearing protection in PPE; this addendum adds the program trigger.

Jackson Telecom field operations may produce intermittent noise from boring equipment, generators, blowers, and traffic. Hearing protection (foam earplugs or earmuffs with appropriate NRR) shall be provided and worn whenever noise levels approach or exceed 85 dBA, when employees must raise their voice to be heard at arm's length, or when working near operating boring/blowing equipment. If routine exposure above the OSHA action level (85 dBA TWA) is identified, a written hearing conservation program will be implemented under 29 CFR 1910.95, including audiometric testing and training.

## A.9 Electrical Equipment Grounding Assurance

👉 **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 11 (Electrical and Power Line Safety) of the original HSE Manual. Section 11 covers overhead lines; this addendum covers tools and cords.

All cord-and-plug-connected electrical tools and equipment used by Jackson Telecom shall be protected by Ground Fault Circuit Interrupters (GFCI) when used outdoors, in damp locations, or on construction sites, in accordance with 29 CFR 1926.404(b). Extension cords, power tools, and portable equipment shall be visually inspected before each use for damaged insulation, missing ground pins, exposed conductors, and defective strain reliefs. Damaged equipment shall be tagged out and removed from service. An Assured Equipment Grounding Conductor Program may be implemented as an alternative to GFCI on long-duration projects when documented in writing and approved in advance by Jackson Telecom management.

## ADDENDUM B

### Management of Change (MOC) and Root Cause Analysis (RCA) Procedures

#### B.1 Management of Change (MOC) Process

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Companion procedure to Section 7 (Job Safety Analysis Program) of the original HSE Manual. MOC is the procedure for what to do when conditions change after the JSA has been signed. New stand-alone procedure; could be added as Section 7.5 in a future revision.

Jackson Telecom LLC recognizes that uncontrolled changes to scope, equipment, personnel, materials, work location, or site conditions are a leading cause of incidents in fiber construction. The Management of Change process described below applies to any material change in conditions that occurs after the daily Job Safety Analysis (JSA) has been completed and signed by the crew.

#### Triggers requiring MOC review:

- Change in work scope or task sequence after the JSA has been signed.
- Change in equipment (switching bucket trucks, introducing new tools, substituting lift methods).
- Change in crew composition, including replacing the designated competent person on a trenching site.
- Change in site conditions: weather, traffic volume, public exposure, soil stability after rain, newly identified utilities, or unexpected energized equipment.
- Change in materials (new chemicals, lubricants, cleaners not covered by existing HazCom review).
- Change requested by the SQUAN project manager, customer, or property owner that alters planned controls.

#### MOC procedure:

- **Stop work.** Stop-work authority extends to every employee and subcontractor without retaliation.
- **Communicate the change.** Crew lead briefs the full crew on what changed, why, and new hazards.
- **Update the JSA.** Original JSA is annotated or a new JSA is started, applying the Hierarchy of Controls.
- **Verify resources.** Confirm equipment, PPE, training, and time required are available before resuming.
- **Re-brief and re-sign.** All crew members and affected subcontractors review and sign before resuming.
- **Document.** Change recorded on Form 12 or attached to daily JSA. SQUAN PM notified for any change affecting scope, schedule, or risk.

Routine, low-risk adjustments that do not introduce new hazards (moving cones, shifting splice location within the same vault) do not require a full MOC review but should be communicated at the next stand-up.

#### B.2 Root Cause Analysis (RCA) Process

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 31 (Incident Reporting and Investigation) of the original HSE Manual. Section 31 already requires investigation of root cause; this addendum specifies the method.

Section 31 of the primary HSE Manual requires that incident investigations focus on facts and prevention, not blame, and explicitly directs that the company must not stop at "employee error" as the only cause. This addendum describes the specific RCA method Jackson Telecom uses.

**When RCA is performed:**

- All recordable injuries and illnesses (OSHA recordable cases).
- All near misses with potential severity rated Medium or High on Form 3.
- All vehicle accidents involving company or rented vehicles.
- All utility strikes, electrical contacts, and trench-related events.
- All environmental spills or releases requiring reporting.
- Any incident specifically requested by the SQUAN project manager or customer.

**Method — 5 Whys with Contributing Factor Review:**

Jackson Telecom uses the 5 Whys technique as the primary RCA tool because it is simple, well-suited to field operations, and consistent with how SQUAN and most telecom prime contractors investigate incidents.

- **Step 1 – Define the event.** Write a factual one-sentence description: what, where, when, who. No blame language.
- **Step 2 – Ask "Why?" five times.** For each answer, ask why that condition existed. Continue until the underlying system, training, supervision, equipment, or procedural cause is reached.
- **Step 3 – Review contributing factors.** Examine People (training, fatigue, fitness), Process (JSA, supervision), Equipment (condition, suitability), Environment (weather, traffic, lighting), Management (resources, communication, schedule pressure).
- **Step 4 – Identify root cause(s).** Most incidents have more than one. "Employee didn't follow procedure" is never accepted as a final root cause without examining why.
- **Step 5 – Assign corrective actions.** Each root cause receives at least one specific, assigned, dated corrective action recorded on Form 12. Tracked to closure and verified.
- **Step 6 – Share lessons learned.** Findings communicated at the next toolbox talk and provided to the SQUAN project manager when the incident occurred on a SQUAN job.

**Documentation:** RCA findings are recorded on the Incident Report (Form 2) or Near Miss Report (Form 3), with the 5 Whys chain and corrective actions attached as a continuation page. Records are retained per 29 CFR 1904, company policy, and contract requirements (whichever is longest).

## ADDENDUM C

### SQUAN-Specific Compliance Commitments

This addendum confirms specific commitments Jackson Telecom LLC makes to SQUAN under the Master Subcontractor Agreement and Exhibit A. These commitments are in addition to, and do not replace, the primary HSE Manual. Where any SQUAN requirement is more stringent than Jackson Telecom's standard practice, the SQUAN requirement governs.

#### C.1 Daily Reporting Commitments

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 32 (Safety Meetings and Toolbox Talks) and Section 4 (Supervisor Responsibilities) of the original HSE Manual. Adds the specific SQUAN-required reports.

*(MSA Section 2(d); MSA Section 3(b) invoicing prerequisites.)*

Jackson Telecom shall submit the following on every workday under a SQUAN PO:

- **SQUAN Safety Observation Tour (SOT) / Crew Rollup Checklist** – completed daily by the crew lead and submitted to the designated SQUAN project manager on the same business day.
- **Daily Production Reports ("Dailies")** – submitted within 24 hours of work completion, including production quantities, locations, crew, equipment, and safety observations or near misses.
- **Daily Job Safety Analysis (JSA / Tailboard)** – Form 1, signed by all crew members before field work begins, available to SQUAN on request.
- **Equipment Pre-Use Inspection Records** – Forms 4 (bucket truck), 5 (ladders), 6 (trenching), 7 (PPE), and 8 (vehicles), as applicable to the day's work.

#### C.2 Behavior-Based Safety (BBS) Hazard Reporting

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 33 (Subcontractor Safety Compliance) and Section 5 (Employee Responsibilities) of the original HSE Manual.

*(Exhibit A – Subcontractor Involvement.)*

- All Jackson Telecom personnel and subcontractors will participate in any BBS observation or near-miss reporting system implemented by SQUAN or SQUAN's customer.
- Employees are encouraged to submit observations and near-miss reports without fear of retaliation, consistent with Stop Work Authority in Section 1 of the primary HSE Manual.
- BBS observations Jackson Telecom captures internally (Form 3) will be shared with the SQUAN PM when relevant to a SQUAN job.
- BBS reporting will not be used as a basis for discipline against the person reporting.

#### C.3 Tower Certification of Personnel

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 12 (Aerial Construction Safety) of the original HSE Manual. New stand-alone topic; could be added as Section 12.5 in a future revision.

*(MSA Sections 1(c) and 1(f).)*

- All personnel assigned to climb or work on telecommunications towers, monopoles, rooftops, or elevated structures under a SQUAN PO shall hold current, recognized tower-climber certifications (ComTrain, NWSA, Gravitec, or equivalent) appropriate to the work.
- All personnel performing aerial fiber, bucket truck, and elevated work shall be trained in fall protection per Section 29 of the primary HSE Manual and 29 CFR 1926 Subpart M.
- Authorized rescue training shall be maintained for personnel working at height.
- Certifications shall be reviewed prior to assignment and re-verified at the frequency required by the certifying body, customer contract, or applicable regulation, whichever is most stringent.
- If a SQUAN assignment requires a certification a specific employee does not hold, that employee will not be assigned until the certification is obtained or the work is reassigned to a qualified subcontractor.

#### C.4 SQUAN Safety Orientation and Pre-Job Meetings

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 31 (HSE Orientation, Training, and Competency) of the original HSE Manual. Adds a SQUAN-specific orientation step on top of Jackson Telecom's own orientation.

*(Exhibit A – Subcontractor Involvement.)*

- Attend the SQUAN safety orientation provided as part of any pre-job or kick-off meeting before work begins.
- Participate in SQUAN tailgate safety meetings, JSAs, hazard assessments, and on-the-job safety inspections.
- Participate in any post-job safety performance review SQUAN conducts.
- Cooperate with SQUAN safety personnel during site visits, audits, and investigations, including providing access to training records, certifications, equipment inspection records, and incident reports.

#### C.5 Drug and Alcohol Policy Alignment

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 30 (Drug and Alcohol Program) of the original HSE Manual. Aligns Jackson Telecom's existing program with SQUAN-specific requirements.

*(MSA Exhibit A – General Requirements; primary HSE Manual Section 30.)*

- Comply fully with SQUAN's Drug and Alcohol policy and onsite safety rules throughout work performed under any SQUAN PO.
- Where SQUAN's requirements are more stringent than Jackson Telecom's standard policy, the more stringent applies.
- Monitor employees for substance abuse and report nonconformities to SQUAN.
- Remove from any SQUAN site, immediately and without penalty to SQUAN, any employee or subcontractor reasonably believed to be impaired or in violation of the Drug and Alcohol policy.

#### C.6 Stop-Work Authority and Right of Removal

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 1 (OSHA Compliance and Safety Policy) of the original HSE Manual. Section 1 already establishes stop-work authority; this addendum extends it to SQUAN representatives.

*(MSA Sections 2(j), 2(l).)*

- Every Jackson Telecom employee, subcontractor, and SQUAN representative has stop-work authority on any Jackson Telecom job under a SQUAN PO, without retaliation.
- SQUAN may, at its discretion, remove any Jackson Telecom employee or subcontractor from any SQUAN job site for safety reasons, customer complaints, or other lawful reasons. Jackson Telecom will replace such personnel at its expense.
- If Jackson Telecom receives a score below 90 on the SQUAN Evaluation Rating, a documented mitigation plan will be developed and submitted for SQUAN Safety approval, and Jackson Telecom will work in good faith to return to A-rated status.

## C.7 Worksite Restoration and Cleanup

👉 **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 9 (Job Site Safety and Housekeeping) of the original HSE Manual. Adds the chargeback consequence under MSA Section 2(e).

*(Exhibit A – Subcontractor Involvement; MSA Section 2(e) chargeback rates.)*

Jackson Telecom commits to clean up and restore the worksite at the end of each shift and at the completion of each job, including: removal of fiber scraps and debris into appropriate containers; restoration of sidewalks, driveways, and yards; securing of handholes, vaults, and excavations; and removal of all tools, equipment, and materials. Jackson Telecom acknowledges that failure to maintain acceptable cleanup may result in chargebacks under MSA Section 2(e) at the rates specified in that section, deducted from open invoices or retainage at SQUAN's discretion. If directed by SQUAN to perform rework, Jackson Telecom will commence within 48 hours of notification per MSA Section 2(e).

## ADDENDUM D

### MSA-Specific Operational and Compliance Commitments

This addendum addresses specific obligations in the SQUAN Master Subcontractor Agreement that fall outside the safety-program scope of the primary HSE Manual but are nonetheless mandatory subcontractor commitments. Each section below cites the MSA section and the related Pre-Qualification Form question(s) it satisfies.

#### D.1 Background Check Program

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL: NEW STAND-ALONE.** No equivalent in the original HSE Manual. Sits logically between Section 30 (Drug and Alcohol) and Section 31 (Incident Reporting) if integrated in a future revision. Records retained per Section 32.

*(MSA Section 2(i) – Background Checks.)*

Prior to assigning any personnel or lower-tier subcontractor to perform Services under a SQUAN purchase order, Jackson Telecom shall, to the extent permitted by applicable law:

- **Identity verification.** Obtain and retain a copy of photographic government-issued identification (driver's license, passport, or equivalent) for each individual.
- **Criminal background check.** Conduct a criminal background check covering all jurisdictions (counties or states, whichever is more comprehensive, plus a federal check in the United States) where the individual was employed or resided for the past **seven (7) years**, or longer if required by a customer contract.
- **Disqualifying findings.** Jackson Telecom will not assign any individual whose background check shows: (a) felony or misdemeanor convictions involving dishonesty (bribery, fraud, embezzlement, theft) or violence (including sexual or child abuse crimes); (b) any restriction (such as a court order) preventing or limiting the individual's ability to perform the Services; or (c) any indication that the individual presents a security risk to a SQUAN customer.
- **Recurring re-check.** New background checks will be conducted on assigned individuals every **three (3) years**, or more frequently if required by customer contract.
- **Documentation.** Upon SQUAN's request and subject to applicable law, Jackson Telecom will provide documentation verifying compliance with this section.
- **SQUAN removal authority.** Jackson Telecom acknowledges that nothing in its background-check program limits SQUAN's right to remove any individual from any SQUAN assignment at SQUAN's sole discretion.

#### D.2 Project Manager Designation and Status Reporting

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 2 (Roles and Responsibilities) of the original HSE Manual. Section 2 names Ronald as the highest-ranking HSE person; this addendum names him specifically as the SQUAN-facing Project Manager.

*(MSA Section 1(g).)*

Jackson Telecom designates **Ronald Jackson, Owner / Operations Manager**, as its primary Project Manager for all work performed under SQUAN purchase orders, with authority to assign, schedule, and supervise Jackson Telecom personnel and lower-tier subcontractors. Ronald Jackson, or a qualified designee identified in

writing to SQUAN, shall:

- Provide status reports to the SQUAN designated project manager at intervals and with content as SQUAN may request from time to time.
- Be available during regular business hours to confer with SQUAN regarding work performance and Services.
- Notify SQUAN promptly of any material defect, misstatement, or omission in any Services rendered, per MSA Section 2(b).
- Coordinate scheduling of Services with the customer through SQUAN, as required by MSA Section 1(b).

### D.3 Licenses, Permits, and Certificates

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 1 (OSHA Compliance and Safety Policy) of the original HSE Manual.

*(MSA Section 2(a)(iv).)*

Jackson Telecom shall, at its sole cost and expense, obtain, maintain, and furnish all licenses, permits, and certificates required by applicable law in connection with its provision of Services and as may be necessary to perform Installations in a professional, safe, proper, efficient, timely, and workmanlike manner. This includes, without limitation: state contractor licensing where required; municipal work permits; right-of-way permits; one-call/locate tickets (Georgia 811, Miss Dig, or applicable state service); DOT vehicle registrations and operating authorities; and any project-specific authorizations. Copies of current licenses and certificates will be provided to SQUAN on request.

### D.4 Equal Employment Opportunity / Affirmative Action

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 1 (OSHA Compliance and Safety Policy) of the original HSE Manual. Section 1 needs an EEO sentence added; the full statement lives here.

*(MSA Section 2(c).)*

Jackson Telecom LLC is an Equal Opportunity Employer. Jackson Telecom and its employees, agents, and subcontractors shall comply with all equal employment opportunity and affirmative action requirements of federal, state, and local authorities, including but not limited to Title VII of the Civil Rights Act of 1964, the Age Discrimination in Employment Act, the Americans with Disabilities Act, Section 503 of the Rehabilitation Act of 1973, the Vietnam Era Veterans' Readjustment Assistance Act, and Executive Order 11246 where applicable. Jackson Telecom does not discriminate on the basis of race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, protected veteran status, or any other legally protected characteristic in employment, training, compensation, promotion, or any other condition of employment.

### D.5 Borrowed or Rented SQUAN Equipment


☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 20 (Tools, Equipment, Owned/Leased Materials) of the original HSE Manual. Section 20 covers Jackson Telecom equipment; this addendum covers SQUAN-borrowed equipment.

*(MSA Section 1(d).)*

If SQUAN, in its sole discretion, allows Jackson Telecom to use or rent any SQUAN vehicle (e.g., bucket truck, splice van), tool, or equipment (e.g., scaffold, ladder, mini-excavator), Jackson Telecom acknowledges that such items are supplied **AS-IS with no warranties whatsoever**, and that all warranties of merchantability and fitness for a particular purpose are expressly disclaimed by SQUAN. Jackson Telecom shall:

- Inspect all borrowed or rented vehicles, tools, and equipment before use to verify they are safe and fit for their intended purpose. The inspection shall be documented using the appropriate Jackson Telecom form (Form 4 for bucket trucks, Form 5 for ladders, Form 8 for vehicles, or a written inspection record).
- Refuse to use any borrowed item that is unsafe or unfit for the intended task, and notify SQUAN promptly.
- Operate borrowed equipment only with personnel trained and authorized to operate that specific equipment (per Section 20 of the primary HSE Manual).
- Maintain insurance covering the use of borrowed equipment as required by MSA Section 5.
- Acknowledge and accept the indemnification obligations to SQUAN set forth in MSA Section 1(d) for any claim, damage, injury, death, or liability resulting from Jackson Telecom's use of borrowed equipment.

## D.6 SQUAN- and Customer-Supplied Materials


 **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 20 (Tools, Equipment, Owned/Leased Materials) of the original HSE Manual.

*(MSA Section 1(e).)*

Materials provided by SQUAN, the Operator, or SQUAN's customer at warehouse, construction yard, or customer site locations shall be handled by Jackson Telecom as follows:

- Materials will be inventoried and stored in a secure area as designated by SQUAN or the customer.
- Jackson Telecom shall be responsible for any and all material it removes from the secure area, including tracking, accountability, and protection from damage, theft, and loss.
- Material removals shall be documented and reconciled to the work performed.
- Loss or damage to SQUAN- or customer-supplied material is subject to indemnification under MSA Section 6 and may result in chargebacks under the chargeback rates in MSA Section 2(e) (Material: Cost plus 30%; Damage Claims: Cost plus 30%).

## D.7 Toxic and Hazardous Materials on Customer Premises

 **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 23 (Hazard Communication / WHMIS) of the original HSE Manual.

*(MSA Section 2(e).)*

Jackson Telecom shall not bring any toxic or hazardous materials onto the premises of any SQUAN customer without the prior **written permission of SQUAN**. If toxic or hazardous materials are introduced with SQUAN's written permission, Jackson Telecom shall be responsible for their proper handling, storage, use, and removal in accordance with all applicable federal, state, and local laws and any additional requirements specified by SQUAN or the customer. Hazard Communication requirements in Section 23 of the primary HSE Manual apply.

## D.8 Use of Lower-Tier Subcontractors

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 33 (Subcontractor Safety Compliance) of the original HSE Manual. Adds the SQUAN-required prior-written-consent step.

*(MSA Section 2(k).)*

Jackson Telecom shall **not subcontract any part of the Services or any Installation without the prior written notification to and consent of SQUAN**. All services performed by an approved lower-tier subcontractor shall be deemed work performed by Jackson Telecom. Jackson Telecom remains fully responsible for all acts, errors, omissions, and negligence of its lower-tier subcontractors and shall require all such subcontractors to subscribe to and maintain the scope of insurance coverage required under MSA Section 5. Nothing in any subcontractor relationship shall create a contractual relationship between SQUAN and any Jackson Telecom subcontractor.

## D.9 Lower-Tier Subcontractor HSE Selection and Management

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 33 (Subcontractor Safety Compliance) of the original HSE Manual. Adds the selection and HSE-program criteria SQUAN's Pre-Qual Form requires.

*(Pre-Qualification Form: Subcontractor Management; Section 33 of the primary HSE Manual.)*

When Jackson Telecom uses lower-tier subcontractors, the following selection and management criteria apply:

- **HSE performance criteria in selection.** Lower-tier subcontractors shall be evaluated on their HSE performance history, including TRIR, EMR, and any history of OSHA citations or significant incidents.
- **Ability to comply.** Jackson Telecom shall verify that the lower-tier subcontractor is capable of complying with applicable OSHA requirements, the Jackson Telecom HSE Manual, and SQUAN HSE requirements.
- **Written HSE program.** Lower-tier subcontractors shall provide a written HSE program covering, at minimum, the work practices applicable to their assigned scope.
- **Inclusion in program elements.** Lower-tier subcontractors shall be included in HSE orientation, HSE meetings, equipment inspections, and HSE program audits, with deficiencies documented and tracked to closure on Form 12.
- **Insurance.** Lower-tier subcontractors shall carry insurance meeting MSA Section 5 requirements before commencing work, with certificates provided to Jackson Telecom and SQUAN.
- **Right of removal.** Jackson Telecom retains the right to remove any lower-tier subcontractor that fails to comply with HSE requirements, and SQUAN may direct such removal under MSA Section 2(l).

## D.10 Drug and Alcohol Testing – Return to Work

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 30 (Drug and Alcohol Program) of the original HSE Manual. Section 30 covers pre-employment, reasonable cause, and post-incident; this addendum adds return-to-work testing as required by SQUAN's Pre-Qual Form.

*(Pre-Qualification Form: Drug and Alcohol Program – Post-rehabilitation/Return to Work Testing.)*

In addition to the pre-employment, reasonable cause, and post-incident testing programs described in Section 30 of the primary HSE Manual, Jackson Telecom maintains a **post-rehabilitation / return-to-work testing** protocol. An employee who has tested positive, has self-disclosed substance abuse, or has completed a substance abuse treatment program shall, prior to returning to safety-sensitive duty:

- Provide documentation of successful completion of an approved treatment or rehabilitation program where applicable.
- Submit to a return-to-duty drug and/or alcohol test administered by a qualified third-party provider, with a verified negative result.
- Sign a return-to-work agreement that may include unannounced follow-up testing for a defined period (typically up to 12 months).
- Be removed from safety-sensitive duty if the return-to-duty test is positive or if any follow-up test is positive, refused, or adulterated.

### D.11 First Aid and On-Site Medical Services

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 27 (First Aid Procedures) of the original HSE Manual. Section 27 is general; this addendum is the specific description SQUAN's form asks for.

*(Pre-Qualification Form: Medical – describe how on-site first aid is provided.)*

Jackson Telecom provides first aid and on-site medical services through the following arrangements:

- **First aid kits** meeting ANSI Z308.1 are stocked in every Jackson Telecom service vehicle and bucket truck. Kits are inspected monthly using Form 8 (vehicle inspection) and restocked as needed.
- **Trained first aid / CPR providers.** At least one Jackson Telecom employee on each crew is, or will be, trained and current in adult first aid, CPR, and AED use through American Red Cross, American Heart Association, or equivalent. Training records are maintained on Form 9.
- **Emergency medical response.** For serious injury (loss of consciousness, severe bleeding, fall from height, electric shock, trench collapse, amputation, eye injury, or any uncertain serious condition), the crew calls 911 first, provides scene information including exact location and nearest cross street, and provides only the first aid for which they are trained.
- **Bloodborne pathogen protection.** Disposable gloves, CPR barriers, and biohazard bags are stocked in first aid kits. Employees providing first aid use universal precautions.
- **Local medical clinic.** Crew leads are responsible for identifying the nearest urgent care or emergency department for each work location and noting it on the daily JSA (Form 1).
- **Workers' compensation.** All work-related injuries and illnesses are reported per Section 31 of the primary HSE Manual and processed through the Jackson Telecom workers' compensation insurance carrier.

### D.12 Trades and Crafts – Certifications Held

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 31 (HSE Orientation, Training, and Competency) of the original HSE Manual. **NEW STAND-ALONE roster** — updated independently as personnel/certifications change.

*(Pre-Qualification Form: Employee and Trades Training.)*

Jackson Telecom personnel hold or will hold, prior to performing the related work under any SQUAN PO, the following job-specific certifications and qualifications appropriate to assigned scope:

Trade / Craft	Certification or Qualification
Tower climbing / elevated work	ComTrain, NWSA TTT-1, Gravitec, or equivalent (current)

Authorized rescue at height	ComTrain Rescue, Gravitec Rescue, or equivalent
Bucket truck / aerial lift operation	Equipment-specific operator training per 29 CFR 1926.453 (ANSI A92)
Fall protection (competent / authorized)	OSHA-aligned fall protection training per 29 CFR 1926 Subpart M
Trenching / excavation competent person	OSHA Subpart P competent person training (when performing trenching ≥5 ft)
Fiber splicing	Manufacturer/OEM training on fusion splicing equipment in use
Underground / utility locates	OSHA-aligned excavation safety; one-call/811 procedures
First aid / CPR / AED	American Red Cross, AHA, or equivalent (current)
Driver licensing	Valid state driver's license appropriate to vehicle class (CDL where required)
OSHA awareness	OSHA 10-hour Construction (minimum); OSHA 30 for supervisors
Hazard communication	Site-specific HazCom / GHS training per 29 CFR 1910.1200

Jackson Telecom maintains certification records on Form 9 (Training Record) and will provide documentation to SQUAN upon request. Personnel will not be assigned to work that requires a certification they do not hold.

### D.13 Equipment Acquisition – HSE Specifications

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 20 (Tools, Equipment, Owned/Leased Materials) of the original HSE Manual.

*(Pre-Qualification Form: Equipment and Materials.)*

Jackson Telecom maintains a system to ensure that equipment and materials acquired for use in field operations meet applicable health, safety, and environmental specifications. Specifically:

- **Specification review.** Before purchase or lease, equipment is reviewed against the OSHA standard, manufacturer-recommended duty rating, and the specific hazards of the intended task (electrical exposure, fall protection compatibility, load rating, etc.).
- **Manufacturer compliance.** Equipment is acquired from established manufacturers with documentation of compliance with applicable ANSI, OSHA, and DOT standards.
- **Inspection on receipt.** New or rented equipment is inspected on receipt and before first use using the appropriate Jackson Telecom form (Forms 4, 5, 7, 8) and documented.
- **Maintenance.** Equipment is maintained per manufacturer instructions and applicable regulatory requirements; certifications (such as annual bucket truck dielectric testing) are tracked.
- **Records.** Inspection, maintenance, and certification records are retained per Section 32 of the primary HSE Manual.
- **Removal from service.** Defective equipment is tagged and removed from service immediately, with deficiencies documented on Form 12 and tracked to closure.

### D.14 Acknowledgment of "Non-Approved" Status Authority

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 33 (Subcontractor Safety Compliance) of the original HSE Manual. **NEW STAND-ALONE** acknowledgment specific to SQUAN's MSA and Exhibit A authority.

*(MSA Exhibit A – Pre-Qualification, Evaluation Rating, and Acceptance.)*

Jackson Telecom acknowledges and agrees that:


- SQUAN reserves the sole right to designate Jackson Telecom's safety status under the SQUAN Subcontractor Safety Management Plan, including the right to assign a "Non-Approved" status if Jackson Telecom shows insufficient progress toward an accepted mitigation plan or other agreed criteria.
- A "Non-Approved" status will result in Jackson Telecom not being used at any SQUAN site.
- Per MSA Section 2(c), if Jackson Telecom receives a score of less than 90 points in the Evaluation Rating and Acceptance score, SQUAN may delay payment obligations by up to an additional fifteen (15) days.
- Jackson Telecom commits to maintaining an A rating ( $\geq 90$  points) and to promptly developing and executing a written mitigation plan if scored below 90, in good-faith collaboration with SQUAN Safety.

## ADDENDUM E

### HSE Meeting and Inspection Frequency Schedule

The SQUAN Pre-Qualification Form requests specific frequencies for HSE meetings and inspections. The tables below establish Jackson Telecom’s standard frequencies, which apply unless a SQUAN customer or project-specific requirement is more stringent (in which case the more stringent frequency applies).

#### E.1 HSE Meeting Frequencies

 **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 32 (Safety Meetings and Toolbox Talks) of the original HSE Manual. Section 32 establishes that meetings happen; this table establishes how often.

Meeting Type	Audience	Frequency	Documented On
Daily JSA / Tailboard	All crew members on each crew, including subcontractors	Daily, before field work begins; updated upon any material change in conditions	Form 1
Toolbox Talk / Weekly Safety Meeting	All field employees and on-site subcontractors	Weekly, minimum	Meeting log + sign-in sheet
Pre-Job / Kick-Off Safety Briefing	All assigned crew, supervisors, and applicable subcontractors	Before start of each new project or PO; before mobilization	Project file
New Hire HSE Orientation	Each new employee and each newly hired or promoted supervisor	Before first field assignment	Form 9
Subcontractor HSE Orientation	Each lower-tier subcontractor (and their personnel) upon engagement	Before subcontractor starts work	Form 9 + sub orientation log
SQUAN Safety Orientation Attendance	All assigned Jackson Telecom personnel on SQUAN jobs	As required by SQUAN, typically pre-mobilization	SQUAN attendance record
Supervisor / Crew Lead Safety Meeting	All Jackson Telecom supervisors and crew leads	Monthly, minimum	Meeting minutes
Management Safety Review	Owner / Operations Manager and supervisors	Quarterly, minimum (incident trends, KPIs, mitigation plan status)	Management review record
Post-Incident / After-Action Meeting	Affected crew, supervisor, and management	Within 24-48 hours of any recordable, near miss (Med/High), or significant incident	Form 2 / Form 3
Post-Job Safety Performance Review	SQUAN PM, Jackson Telecom PM, key crew	At conclusion of each major SQUAN PO or as requested by SQUAN	Project file

## E.2 Inspection and Audit Frequencies

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 37 (Internal HSE Inspections, Audits, and Corrective Actions) of the original HSE Manual. Section 37 says inspections happen; this table says how often.

Inspection / Audit Type	Performed By	Frequency	Documented On
Job Site Field Inspection	Crew lead / supervisor	Daily during active work; reinspect after weather, incident, or material change in conditions	Form 10 / daily log
Internal HSE Program Audit	Owner / Operations Manager	Annual, minimum; additional audits triggered by incident trends or new contract requirements	Form 10
Equipment Pre-Use Inspection	Operator / user	Each shift, before use	Forms 4, 5, 7, 8
Trenching / Excavation Inspection	Designated competent person	Before each shift; after every rainstorm or other hazard-changing event; as conditions change	Form 6
Subcontractor HSE Inspection	Jackson Telecom supervisor	Daily during subcontractor active work + spot audits	Form 10
Corrective Action Closure Verification	Owner / Operations Manager or designee	Within the due date assigned on Form 12; not exceeding 30 days for non-emergency items	Form 12
Vehicle / Fleet Inspection	Driver	Daily pre-trip; documented monthly fleet review	Form 8

## E.3 Equipment Inspection and Certification Frequencies

☞ **INTEGRATES WITH ORIGINAL HSE MANUAL:** Section 20 (Tools, Equipment, Owned/Leased Materials) of the original HSE Manual.

Equipment	Inspection / Certification	Frequency
Bucket truck / aerial lift	Pre-use inspection (Form 4)	Each day of use
Bucket truck dielectric / ANSI A92 inspection	Documented annual inspection per ANSI A92 / manufacturer	Annual, minimum
Ladders	Pre-use inspection (Form 5); damaged ladders tagged out	Each use
Fall protection harnesses, lanyards, lifelines	User inspection before each use; competent person formal inspection	Each use; competent person ≥ annual
Fire extinguishers in vehicles / on site	Visual inspection; annual maintenance check by certified provider	Monthly visual; annual professional

First aid kits	Inspection of contents and expiration dates	Monthly
Vehicles	Pre-trip inspection (Form 8); documented PM service	Daily / per manufacturer schedule
Fusion splicers, cleavers, OTDR test equipment	Functional check before use; manufacturer-recommended calibration / service	Per manufacturer schedule
Pulling / blowing equipment, winches	Pre-use inspection; manufacturer maintenance	Each use; per manufacturer schedule
PPE (hard hats, glasses, gloves, hi-vis)	User inspection (Form 7); replace if damaged or expired	Each shift

## ADDENDUM F

### MSA / Exhibit A Compliance Cross-Reference Matrix

This matrix maps every safety- and compliance-related obligation in the SQUAN Master Subcontractor Agreement and Exhibit A to the location in the Jackson Telecom HSE Manual or these Addenda where the obligation is addressed.

SQUAN Requirement	Source	Addressed In
Customer flow-down compliance, tower certifications	MSA 1(c), 1(f)	Addendum C.3
Borrowed/rented SQUAN equipment AS-IS; inspection; indemnity	MSA 1(d)	Addendum D.5
SQUAN/customer-supplied material handling and accountability	MSA 1(e)	Addendum D.6
Project Manager designation; status reports; availability	MSA 1(g)	Addendum D.2
Qualified personnel; industry standards; workmanlike performance	MSA 2(a)(i)	HSE Manual Sec 1, 31
Compliance with Subcontractor Safety Management Plan (Exhibit A)	MSA 2(a)(ii)	Addenda C, D, E, F
Licenses, permits, certificates	MSA 2(a)(iv)	Addendum D.3
Safeguards, warning signs, supervisory personnel on site	MSA 2(a)(vi)	HSE Manual Sec 4, 6, 10
Workmanship warranty; notice of defects; anti-bribery	MSA 2(b)	HSE Manual Sec 31; Addendum D.2
OSHA compliance; EEO/Affirmative Action; ≥90 score	MSA 2(c)	HSE Manual Sec 1, 39; Addenda D.4, D.14
Building rules, security; SOT forms; daily Dailies	MSA 2(d)	Addendum C.1
Cleanup; no toxic materials w/o permission; chargebacks; 48-hr rework	MSA 2(e)	HSE Manual Sec 9, 24; Addenda C.7, D.7
Provide all tools and equipment	MSA 2(f)	HSE Manual Sec 20
Background checks (7-yr scope, photo ID, every 3 yrs)	MSA 2(i)	Addendum D.1
Replacement of unsuitable personnel on SQUAN request	MSA 2(j)	Addendum C.6
Use of lower-tier subcontractors with prior written consent	MSA 2(k)	Addendum D.8
SQUAN disqualification authority over personnel	MSA 2(l)	Addendum C.6
Time is of the essence; continued performance during dispute	MSA 2(m)	Operational acknowledgment
No infringement; rights to perform	MSA 2(o)(i)	Operational representation

Insurance coverages & SQUAN as additional insured	MSA 5(a), 5(b), 5(c)	Separate Certificates of Insurance
Indemnification of SQUAN Indemnified Parties	MSA 6	Operational acknowledgment
Independent contractor; tax/WC/benefits responsibility	MSA 7	Operational acknowledgment
Confidentiality of SQUAN information	MSA 8	Operational acknowledgment
Ramp-down cooperation on termination	MSA 10(k)	Operational acknowledgment
Pre-approval of subcontractor by SQUAN safety dept	Exhibit A General	Addenda C.4, D.14
Drug & Alcohol policy compliance (incl. return-to-work)	Exhibit A; PreQual	HSE Manual Sec 30; Addenda C.5, D.10
"Non-Approved" status acknowledgment	Exhibit A	Addendum D.14
Pre-job safety orientation attendance	Exhibit A	Addendum C.4
Substance abuse monitoring and reporting	Exhibit A	HSE Manual Sec 30; Addendum C.5
Personnel training and competency	Exhibit A; PreQual	HSE Manual Sec 31; Addendum D.12
Inclusion in SQUAN tailgate, JSA, inspections	Exhibit A	Addendum C.4
Pre-job equipment inspection	Exhibit A	HSE Manual Sec 20; Forms 4, 5, 7, 8; Addendum E.3
BBS hazard reporting participation	Exhibit A	Addendum C.2
Reporting injuries, spills, property damage, near misses	Exhibit A	HSE Manual Sec 31; Forms 2, 3, 11
Onsite / Owner Client safety rules compliance	Exhibit A	Addendum C.4
Implementation of SQUAN safety practices	Exhibit A	Addenda C, D
Worksite cleanup and restoration	Exhibit A	HSE Manual Sec 9; Addendum C.7
Regulatory compliance at all times	Exhibit A	HSE Manual Sec 1, 39
Post-job safety performance reviews	Exhibit A	Addendum C.4; Addendum E.1
Written HSE program with all required elements	PreQual	HSE Manual Sec 1-39
Permit to Work / Lockout-Tagout	PreQual	Addendum A.1
Confined Space Entry	PreQual	Addendum A.2
Respiratory Protection	PreQual	Addendum A.3
Compressed Gas Cylinders	PreQual	Addendum A.4
Powered Industrial Vehicles	PreQual	Addendum A.5

Highly Hazardous Chemicals / Explosives	PreQual	Addendum A.6
Medical Examinations	PreQual	Addendum A.7
Hearing Protection	PreQual	Addendum A.8; HSE Manual Sec 8
Electrical Equipment Grounding Assurance	PreQual	Addendum A.9
Job Safety Analysis (JSA)	PreQual	HSE Manual Sec 7; Form 1
Root Cause Analysis	PreQual	Addendum B.2
Management of Change (MOC)	PreQual	Addendum B.1
First aid / on-site medical services description	PreQual	Addendum D.11
First aid / CPR trained personnel	PreQual	HSE Manual Sec 27; Addendum D.11
PPE inspection / maintenance program	PreQual	HSE Manual Sec 8; Form 7
HSE meeting frequencies (Field Sup, Emp, New Hire, Sub)	PreQual	Addendum E.1
Internal HSE inspection / audit frequencies	PreQual	Addendum E.2; HSE Manual Sec 37
Equipment HSE specifications for acquisition	PreQual	Addendum D.13
Equipment inspection and maintenance certification records	PreQual	Addendum E.3; HSE Manual Sec 32
Lower-tier subcontractor written HSE program & selection criteria	PreQual	Addendum D.9
Trades / crafts certifications list	PreQual	Addendum D.12
HSE Orientation for new hires AND newly hired/promoted supervisors	PreQual	HSE Manual Sec 31; Addendum E.1
Specific HSE training program for supervisors	PreQual	HSE Manual Sec 31; Addendum E.1
Training records: employee ID, date, trainer, verification method	PreQual	HSE Manual Sec 32; Form 9
Verification of training understanding (written, oral, demo, observation)	PreQual	HSE Manual Sec 31; Form 9
TRIR, EMR, DART, MVIFR, fatality statistics (3-year)	PreQual	Submitted separately on PreQual Form

## ADDENDUM G

### Acknowledgment and Adoption

By signing below, Jackson Telecom LLC adopts Addenda A, B, C, D, E, F, and H as incorporated supplements to the Jackson Telecom LLC Health, Safety & Environmental Manual (Final Prime Version, Effective 5/3/26). These addenda shall be read together with, and enforced with the same authority as, the primary HSE Manual. Where any conflict exists between these addenda, the primary HSE Manual, the SQUAN Master Subcontractor Agreement, Exhibit A, or any SQUAN customer requirement, the most stringent requirement applies.

### Management Adoption

**Owner / Operations Manager:** Ronald Jackson

**Company:** Jackson Telecom LLC

**Signature:** \_\_\_\_\_

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

### Document Control

<b>Document:</b>	Jackson Telecom HSE Manual Addenda A, B, C, D, E, F, G, H
<b>Version:</b>	Addenda Rev. 2 – With Integration Map
<b>Effective Date:</b>	5/3/26
<b>Supplements:</b>	Jackson Telecom HSE Manual – Final Prime Version (Effective 5/3/26)
<b>Applies to:</b>	All Jackson Telecom personnel and lower-tier subcontractors performing work under SQUAN Construction Services, LLC (with Pre-Qualification submission); Jackson Telecom personnel and
<b>Next Review:</b>	Within 12 months of Effective Date, or upon material change in scope, regulation, or customer requirements
<b>Distribution:</b>	SQUAN Construction Services, LLC (with Pre-Qualification submission); Jackson Telecom personnel and