

The Wright Way Company Inc.

Vendor/Subcontractor Policies and Procedures

INTRODUCTORY STATEMENT

This guide outlines our policies and procedures in relation to contractors and subcontractors. As a service-oriented company, operational performance and execution are the core of our business. In fulfilling our commitment to our customers and clients, we routinely enlist the assistance of outside contractors and subcontractors. In order to provide greater specialization of services, we maintain an extensive network of primes and subs to help coordinate emergency response and recovery efforts in disaster zones, assist with construction projects, and supply our clients with equipment. Companies and individuals specializing in these fields of work are encouraged to register with our directory of prime contractors and subcontractors.

Strong working performance is critical to our success, but just as important as success is how we go about achieving results — with honesty and respect, without taking shortcuts, and by operating ethically and with integrity in all that we do. The success of our business is dependent on the trust and confidence we earn from our customers, clients, and contractors. We gain credibility by adhering to our commitments, displaying honesty and reliability and reaching company goals solely through honorable conduct.

BECOMING A VENDOR

Companies and individuals wishing to become a WWC vendor must fill out and submit a 'Vendor Application Form' on our website at www.wrightwayco.com and be registered into our database. Registration is free and will make your company's information available to our planning department. If you satisfy our criteria, will be placed on the approved vendor list.

ONBOARDING

Prior to beginning work on WWC projects, vendor/subs must be properly vetted, cleared, hired, and onboarded pursuant to WWC certification procedures. The following items are required from every subcontractor prior to that company being cleared to begin working:

- Completed Vendor Profile Form
- Signed 2nd Tier Subcontractor Agreement
- Signed Non-Disclosure Agreement
- W-9 Form
- Certificate of Insurance (COI) (General Liability and Workers Comp) (Certificates of Insurance should also list The Wright Way Company as additional insured)

These forms can be downloaded from our website, filled out, and returned to us.

The above items must be sent to lsamuels@wrightwayco.com as soon as practicable so that we can process you into our subcontractor database and get you cleared to begin working as quickly as possible. If you have any questions, please call The Wright Way Company office.

When a subcontractor is approved as a WWC vendor and begins working on a WWC project, the vendor/sub must then submit the following additional information:

- Name, position, rate of pay, SSN, and telephone number for each driver and crew member that will be working on the project
- Photos of Placard for each truck
- Photos of Driver's Licenses for each driver

WORKING ON PROJECTS

Safety Procedures

The Wright Way Company Inc recognizes safety as a principal core value and strives to maintain accident free workplaces. This philosophy is embedded into our standard operating policies and procedures. Fundamentally, we place the safety and well-being of the public, our clients, our workers, and our subcontractors first and foremost.

We promote a culture of safety through top management's non-wavering commitment to the implementation and continuation of a Safety Management System (SMS) across the entire organization. Our Safety Management System is a systematic approach to managing safety, including the necessary organizational structures, resources, and accountabilities. In order to keep our clients, customers, the public, and our vendors safe, all vendor/subs must strictly adhere to our safety policies.

Many WWC vendor/subs will be working on cleanup projects in disaster zones, with increased hazards and heightened safety protocols. The hazards outlined below apply to debris collection and removal crews operating heavy equipment to lift, separate, push, load, and haul debris and/or equipment. Building demolition operations are covered in separate OSHA safety sheets: [Assessment, Cleanup, and Repair of Structures](#) and [Building Demolition](#). For other operations or situations (e.g., heavy equipment use, work zone safety) other activity sheets also apply; see OSHA [activity sheets](#).

Disasters that result in property damage typically generate large quantities of debris that must be collected and transported for disposal. Debris must be removed from roads and other public areas to provide emergency access and in preparation for subsequent steps toward recovery. Debris collection and removal tasks include picking up, clearing, separating, and removing debris. Most of these tasks are typically performed using heavy equipment; however, some manual effort can be necessary at every stage. While most debris will be collected from land, after disasters that result in flooding (such as Hurricanes Katrina and Rita, in 2005), debris might

need to be removed from water using cranes or dredges to promote drainage, fully restore maritime commerce, and advance recovery efforts.

Special care is required when collecting and removing materials that are still damp, since wet materials will be heavier than they would have been if dry. Additionally, after a flood, wet materials might be contaminated with any substances that contaminated floodwaters. Response and recovery workers conducting this operation may be employed by Federal, State, local, and private employers.

WORK SITE BASICS -- PERSONAL PROTECTIVE EQUIPMENT

General PPE is required for all disaster response/recovery/cleanup operations. General PPE includes:

- Hard hats must be worn at all times by workers/drivers working in zones where trucks are loading/unloading, in construction zones, in demolition zones, and other zones as required
- High visibility vests must be worn at all times by all workers in all zones
- Eye protection with side shields must be worn by debris workers, construction workers, and heavy equipment operators
- Steel toed boots are required for drivers, debris cleanup, demolition, and construction workers
- Gloves chosen for job hazards expected (e.g., heavy-duty leather work gloves for handling debris with sharp edges and/or chemical protective gloves appropriate for chemicals potentially contacted)
- ANSI-approved protective footwear
- Respiratory protection as necessary-N, R, or P95, filtering facepieces may be used for nuisance dusts (e.g., dried mud, dirt and silt) and mold (except mold remediation). Filters with a charcoal layer may be used for odors

LOADING AND TARPING OF VEHICLES

- Do not overload vehicles, especially when hauling compact materials (i.e. wet mulch)
- Ensure loads are balanced and are fully contained within the vehicle. Trim loads, where necessary, to ensure loads do not extend beyond the sides or top of the vehicle
- Cover and secure the load before moving vehicle
- Tarps must be in good working condition, free of rips and tears
- The operator must be able to fully engage and disengage the tarp without climbing on the trailer

GENERAL HEAVY EQUIPMENT OPERATION

- Where possible, do not allow collection work to be done with heavy equipment under overhead lines
- Inspect debris piles before using equipment to pick them up and ensure that there are no obstructions (e.g., fire hydrants, water meters, etc) underneath that may pose a hazard
- When working from an aerial lift, use a body harness that is properly attached (or body belt for tethering or restraint use only) for fall protection
- Heavy equipment operators must be properly trained and certified/licensed before using such equipment. No one should ever attempt to operate any heavy equipment for which he or she has not been trained and certified



Photo courtesy of OSHA.
This picture shows actual disaster site work

VEHICULAR TRAFFIC SITE SAFETY

- Trucks entering and exiting loading zones **must not exceed speed limit of 5mph**
- Traffic control personnel should develop and use a site plan that provides traffic flow details (see [traffic flow diagrams](#); other [Manual on Uniform Traffic Control Devices \(MUTCD\)](#)).
- Use flaggers, traffic cones, and/or highway channeling devices to steer traffic away from response and recovery workers along the roadway (see [flagger guidance](#))
- Use flaggers, standard road signs (e.g., "work zone ahead"), or message boards to warn approaching vehicles of work area
- Give motorists plenty of warning of upcoming work zones; place the first warning signs at a distance calculated as 4 to 8 times (in feet) the speed limit (in MPH) use a higher multiplier for higher speed areas (e.g., a 15 MPH road should have its first warning sign at least 60 feet from the work zone, while a work zone needed in a 65 MPH zone should have its first sign approximately 520 feet away)



Photo courtesy of the U.S. Army Corp of Engineers. This picture shows actual disaster site work conditions and may not illustrate proper safety and health procedures.

TRAFFIC CONTROL WITHIN WORK AREA

- Flaggers must wear ANSI/ISEA 107-2004 compliant high visibility safety apparel and headwear
- Signaling, slow/stop signs, or wands/flashlights for flaggers providing traffic control outside the work zone
- Develop and use a site plan that provides traffic flow details
- Limit access, barricade, or set up controlled access zones where the equipment will be used; for equipment that rotates and/or carries/dumps loads, create an access zone that extends beyond the maximum rotation/swing radius of the equipment and/or beyond the area where loads will be carried/dumped
- Establish/follow traffic control patterns (e.g., cones, barrels, barricades) in work areas
- Use spotters where visibility is limited
- Do not drive in reverse gear with an obstructed rear view unless the vehicle has an audible alarm or a signaler is used
- Ensure that spotters and heavy equipment operators have communications equipment or agree on and use hand signals
- Response and recovery workers and other pedestrians should make eye contact with heavy equipment operators before proceeding near equipment or operating areas
- Train response and recovery workers not to position themselves between mechanical equipment and a fixed object
- Provide barricades around excavations and structures such as debris reduction observation towers



Photo courtesy of the U.S. Army Corp of Engineers. This picture shows actual disaster site work conditions and may not illustrate proper safety and health procedures.

TRUCKS AND EQUIPMENT

Prior to beginning work on a WWC project, subcontractors need to make sure their trucks and equipment are in proper working order and meet all mandatory safety requirements. Many haul trucks fail their initial check-in safety inspections. In order to pass safety inspections, receive truck certification, and be placarded in, subcontractor companies should inspect their trucks and vehicles ahead of the official safety inspection.

In order to pass inspection, you should make sure your truck is in good working order. Below is a checklist from the safety inspection monitoring agency of what they will be checking for:

1. A copy of the truck's registration
(registration must match the license plates for both the truck and the trailer).
2. Insurance documents showing current insurance (must be kept with truck/driver).
3. All the following must be in proper working order:
 - headlights (high and low beams)
 - turn signals
 - reverse lights
 - horn
 - back up alarm
4. The following items must be in the truck:
 - Fire Extinguisher
 - First aid Kit
 - Spill Kit
5. Seatbelts must be serviceable
6. No cracks in your windows or mirrors
7. Tires must be in good condition
8. Trucks must have mud flaps
9. Tarps must be usable without walking on the load (many trucks fail inspections due to tarp issues. Tarps cannot have any rips or tears, and the driver must be able to fully engage and disengage the tarp without climbing up onto the trailer)
10. Brakes must be able to pass an inspection (pull test).

MISCELLANEOUS SAFETY MATTERS

Disaster job sites differ from normal construction or demolition sites. Therefore, Disaster Site Workers' roles and responsibilities on the job site are not the same either. Whether the disaster is natural or man-made, the on-site worker needs to develop an awareness of safety and health hazards that may be encountered. Additional information can be found on OSHA's website at <https://www.osha.gov/Publications/OSHA3252/3252.html>.

ADMINISTRATIVE MATTERS

Tickets

Tickets for work performed are collected by the vendor/sub and then submitted to WWC for processing and payment. Payments will be based on tickets submitted; vendor/subs will not be paid for claims of work performed that lack documentation, therefore keeping track of tickets is mandatory in order to be compensated for services.

Subcontractor companies and drivers should make copies or photographs of their tickets to keep for their records prior to submitting them to WWC. Information from the tickets must be compiled and entered into a WWC invoicing spreadsheet that can be downloaded from the WWC website at www.wrightwayco.com under the Vendor Forms sections.

The WWC billing cycle runs from Sunday through Saturday. Vendor/subs must compile all tickets collected from Sunday through Saturday, enter the ticket information into the invoicing spreadsheet, and then submit the invoice along with copies of the tickets to WWC no later than 12:00 noon on Monday every week for work performed the previous week. Ticket and invoices not received by Noon on Monday will not be processed until the following week, which will delay payment.

The best practice is for workers/drivers to inventory and log their tickets daily at the end of every work day, instead of weekly, to prevent the number of tickets from accumulating. In this manner, drivers/workers can simply submit their already tallied weekly totals of tickets at the end of the workday on Saturday. Vendor/subs and their workers are strongly advised not to wait until the end of the week and attempt to tally hundreds of tickets at once. This approach has proven problematic in the past, resulting in many a delayed payment to vendor/subs and is thus ill-advised.

Timekeeping and Certified Payroll

All companies subcontracted by WWC to work on government funded disaster relief projects are required to submit detailed time cards and certified payroll forms (Form WH-347) for every worker working on the project every week, as required by federal law under the Davis-Bacon Act and/or the McNamara-O'Hara Service Contract Act. Many WWC projects are government contracts that fall under the provisions of the DBA and/or the SCA, which require all workers on federally funded or federally assisted projects to be paid at least the minimum prevailing wage for that area. As such, by law, all contractors and subcontractors must certify that all workers on the project are being paid at least the prevailing minimum wage as established by the Department of Labor's wage determination schedule.

In order to be compensated for services, all WWC subcontractors must complete federal form WH-347 certifying that their payroll meets the prevailing wage standards and return it to WWC weekly. The current prevailing wage determinations for each state and county are defined by

the Department of Labor and can be found online. In addition to certified payroll forms, vendor/subs must submit detailed time cards reflecting the hours worked for every worker during the workweek. This applies to Owner-Operators, as well, regardless of classification. The U.S. Department of Labor requires WWC to collect this information for recordkeeping purposes in the event of an audit; thus, every worker must track their hours worked and submit time cards and certified payroll forms weekly, including Owner-Operators.

All completed and signed WH-347 forms must be submitted back to WWC by 12:00 noon on Monday showing the hours worked and wages paid for each employee for the preceding week. A blank fillable WH-347 Form can be downloaded from our website at www.wrightwayco.com under the Vendor Forms page and used for this purpose. Completed forms should be sent to Isamuels@wrightwayco.com with "Certified Payroll Form" in the subject line of the e-mail, with cwright@wrightwayco.com and sfrye@wrightwayco.com being CC'd on the email. Failure to comply may result in the delay of payroll processing for that vendor/sub.

CERTIFIED PAYROLL INSTRUCTIONS FOR SUB-CONTRACTORS

Sub-contractors must fill out Form WH-347 as follows:

- **Contractor or Subcontractor:** Fill in your company's name and check appropriate box.
- **Address:** Fill in your company's address.
- **Payroll No.:** Each payroll must be numbered. Your first payroll will be #1... the second #2 ... and so on.
- **For Week Ending:** List the workweek ending date. – subcontractor's invoice billing period must match the dates used for the subcontractor's payroll week.
- **Project and Location:** List the name of the project (e.g. USACE Georgia Debris Removal Project)
- **Project or Contract No.:** W912P8-14-D-0020/XXXX (where XXXX is the task order you are working on)
- **Column 1 - Name and Individual Identifying Number of Worker:** Enter each worker's full name and the last four digits of the worker's social security number on each weekly payroll submitted.
- **Column 2 - No. of Withholding Exemptions:** Not required
- **Column 3 - Work Classifications:** List classification descriptive of the work performed by each employee. The WWC will provide subcontractor with work classification descriptions as well as the correlating wage for each work classification. There is one set of rates for work performed in Crisp County and a second set of rates when the employees are working in any other county on the GA Army Corps of Engineers project for Hurricane Michael in Georgia. If additional classifications are deemed necessary request for additional classification should be made through the WWC. An individual may be shown as having worked in more than one classification provided an accurate breakdown or hours worked in each classification.
- **Column 4 - Hours worked:** List the day and date and straight time and overtime hours worked in the applicable boxes. On all contracts subject to the Contract Work Hours Standard Act, enter hours worked in excess of 40 hours a week as "overtime".
- **Column 5 - Total:** Self-explanatory
- **Column 6 - Rate of Pay (Including Fringe Benefits):** The regular rate of pay is listed; the fringe amount must be listed separately. (Example: base wage per SCA for a laborer is \$11.41 and the Health and Welfare "fringe" is \$4.18)
- **Column 7 - Gross Amount Earned:** Enter gross amount earned on this project. If part of a worker's weekly wage was earned on projects other than the project described on this payroll, enter in column 7 first the amount earned on the Federal or Federally assisted project and then the gross amount earned during the week on all projects, thus "\$163.00/\$420.00" would reflect the earnings of a worker who earned \$163.00 on a Federally assisted construction project during a week in which \$420.00 was earned on all work.

- **Column 8 - Deductions:** Five columns are provided for showing deductions made. If more than five deductions are involved, use the first four columns and show the balance deductions under "Other" column; show actual total under "Total Deductions" column; and in the attachment to the payroll describe the deduction(s) contained in the "Other" column. All deductions must be in accordance with the provisions of the Copeland Act Regulations, 29 C.F.R., Part 3. If an individual worked on other jobs in addition to this project, show actual deductions from his/her weekly gross wage, and indicate that deductions are based on his gross wages.
- **Column 9 - Net Wages Paid for Week:** Self-explanatory.

NOTE: Sub-contractors must accrue 1 hour of "sick" pay for every 30 hours an employee works. Employees must be permitted to use paid sick leave for their own illness, injury or other health-related needs, including preventive care; to assist a family member (or person who is like family to the employee) who is ill, injured, or has other health-related needs, including preventive care; or for reasons resulting from, or to assist a family member (or person who is like family to the employee) who is the victim of, domestic violence, sexual assault, or stalking. Subcontractor must accrue 8 hours of "Holiday Pay" for any week worked where a federal holiday is observed.

Additional information on contractor requirements and worker protections under the law is available at <https://www.dol.gov/whd/govcontracts/>.

Additional information and guidance on how to fill out the form can be found at https://www.dol.gov/whd/regs/compliance/web/SCA_FAQ.htm, <https://www.dol.gov/whd/forms/wh347instr.htm>, and <https://www.foundationsoft.com/tips-davis-bacon/>.

Payment

Vendor/subs must assemble their tickets, invoices, certified payroll forms, and time cards for all their workers, then submit the entire packet to WWC weekly via email. Upon receipt, WWC will process the invoices and supporting documents. Vendor/subs can expect to be paid promptly after WWC receives payment from the Prime, which typically ranges anywhere from 14 to 30 days following submittal, depending on the project and contract.

Note: Due to the administrative processing procedures in place among the various tiers, payments to 2nd tier subcontractors routinely take between 14 and 30 days, but can sometimes take longer; moreover, if a vendor/sub's paperwork isn't submitted thoroughly and properly, the paperwork can be kicked out and returned for correction, resulting in further delays in payment. Therefore, 2nd Tier vendor/subs should maintain enough working capital to carry payroll for their workers for up to several weeks while invoices are being processed. Failure to do so could create cash flow problems for smaller vendor/sub companies with decreased cash reserves. As a rule, 2nd Tier subs should be mindful of the delays associated with government projects and budget their resources accordingly.