



**VANTAGE DATA CENTERS – PROJECT
LIGHTHOUSE STRATEGIC PARTNERSHIP**

Between

**Occupational Safety and Health Administration
Milwaukee Area Office**



And

Wisconsin On-Site Safety and Health Consultation Program



And

**The Weitz Company
Turner McCarthy Joint Venture
The Whiting-Turner Contracting Company**



I. IDENTIFICATION OF PARTNERS

The Milwaukee Area Office of the Occupational Safety and Health Administration (OSHA), Wisconsin On-Site Safety and Health Consultation (WisCon), The Weitz Company, Turner McCarthy Joint Venture, The Whiting – Turner Contracting Company, and Labor Unions recognizes the importance of providing a safe and healthful work environment for workers engaged in the construction industry. For purposes of this agreement the three construction entities will be referred to as the “General Contractor Entities” throughout this agreement. This OSHA Strategic Partnership Agreement (hereafter referred to as “OSP” or “the partnership”) at the Vantage Data Centers - Project Lighthouse at Port Washington, Wisconsin, will facilitate the goals of OSHA to reduce occupational-related fatalities and serious injuries within the construction industry.

The groups listed below have developed this partnership agreement jointly with a common objective to provide a safe and healthful environment for all at the Vantage Data Centers - Project Lighthouse. This agreement intends to focus their combined expertise and knowledge to promote safety and encourage all on-site workers to do their part in achieving the same.

- Milwaukee Area Office of the Occupational Safety and Health Administration (OSHA)
- Wisconsin On-Site Safety and Health Consultation Program (WisCon)
- The Weitz Company
- Turner McCarthy Joint Venture
- The Whiting-Turner Contracting Company

Supporting Groups:

- Bridge, Structural, Ornamental & Reinforcing Iron Workers Union, Local 8
- Chicago Regional Council of Carpenters, North Region
- Electrical Workers Union, Local 494
- Elevator Constructors Union, Local 15
- Boilermakers Union, Local 107
- Bricklayers & Allied Craftworkers Union, Local 8
- Heat & Frost Insulators Union, Local 19
- Laborers International Union, Local 113
- Operating Engineers Union, Local 139
- Painters & Allied Trades, District Council 7
- Plumbers Union, Local 75
- Roofers Union, Local 65
- Sheet Metal Workers Union, Local 18
- Sprinkler Fitters Union, Local 183
- Tile & Terrazzo Layers Protective Union, Local 5
- Teamsters Union, Local 200
- Steamfitters Union, Local 601
- Operative Plasterers & Cement Masons International Union, Local 599
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II. PURPOSE / SCOPE

This Partnership was developed jointly by the Occupational Safety and Health Administration (OSHA), Wisconsin On-Site, and the General Contractor Entities. To facilitate the goal of reducing occupational-

related fatalities and serious injuries within the construction industry, OSHA, WisCon, and the General Contractor Entities will implement an agreement under the OSHA Strategic Partnership Program (OSP). The common objectives and goals of the Partnership will include the following:

- A. Reduction in injuries and illnesses;
- B. Increased safety and health training;
- C. Reducing or eliminating employee exposure to falls, struck-by, caught-in between and electrical hazards

This Agreement covers the Vantage Data Centers Project Lighthouse Project. The project is located in Port Washington just 30 minutes from Milwaukee, Wisconsin, this landmark AI campus is Vantage’s first in the Badger State. The campus, named Lighthouse, is inspired by the iconic Port Washington lighthouse and stands as a guiding light in data center design, rooted in community and driven by sustainability. Spanning 672 acres, the campus will include four single-story data centers totaling 902MW across 2.5 million square feet and is scheduled to be completed in 2028. Driven by unprecedented global demand for cloud and AI computing power, the campus represents the future of sustainable data center development. The campus will be developed by the General Contractor Entities.

By combining their efforts, skills, knowledge, and resources, OSHA, WisCon, and the General Contractor Entities expect to reduce exposure to hazards and decrease the possibility of serious injuries and fatalities at the construction site. This Partnership is consistent with OSHA’s long-range efforts to develop a contractor/government partnership approach to safety management. It allows for better use of OSHA resources and innovation in safety management. It also encourages more participation in the safety process from the construction community.

Specifications and assignments within this Agreement do not relieve the Project subcontractors from or lessen their safety and health responsibilities, nor change any contractual obligations between the General Contractor Entities and subcontractors, nor does it lessen any/all affirmative defenses, legal rights, or due process afforded subcontractors with respect to OSHA enforcement action.

III. GOALS/STRATEGIES/PERFORMANCE MEASURES

The primary objective of this Partnership is to create a working relationship that focuses on 1) preventing work-related fatalities; 2) controlling or eliminating serious workplace hazards; and 3) establishing a foundation for the development of an effective safety and health program. The goals employed to achieve these results will include the following:

Goals	Strategies	Performance Measures
1) Improve safety culture on the project, while engaging with OSHA on a proactive program to enhance this culture throughout the project.	Reinforcement of positive acts, behaviors and innovations. Rewarding safety involvement of workers with active participation by OSHA in handing out rewards during general meetings and walkaround inspections.	Track the number of incentivization methods used on the project and share best practices between the General Contractor Entities.

Goals	Strategies	Performance Measures
<p>2) Minimize accidents, injuries, and illnesses on the Project; zero fatalities; and maintain Project injury/illness data below the baseline and current Bureau of Labor Statistics (BLS) National Average for NAICS 23 (all of construction).</p> <p>Annually reduce the total number of injuries and illness cases by 10 percent.</p>	<p>Implementation of comprehensive safety and health management system for the Project.</p> <p>a) Review the OSHA 300 data of all Project subcontractors to determine injury and illness trends and implement effective corrective action(s).</p> <p>b) Calculate each contractor's Total Case Incident Rate (TCIR), Days Away, Restricted, or Transfer (DART) rates, and Days Away From Work (DAFW) rates.</p> <p>c) Compare this TCIR, DART, and DAFW data with the baseline rates and most current BLS data.</p> <p>Partners will meet quarterly to review injury and illness statistics and work together to resolve workplace safety and health issues to reduce injuries and illnesses.</p>	<p>The partnership will compare site:</p> <p>Total Case Incident Rate (TCIR).</p> <p>Days Away, Restricted or Transferred (DART) Rate.</p> <p>Days Away From Work (DAFW) Rate.</p> <p>A comparison of actual project injury and illness data to the baseline, and most current published BLS Data, for NAICS 23 will occur annually.</p> <p>Note: The 2024 BLS published TCIR, DART, and DAFW rates for NAICS 23 are 2.2, 1.3, and 0.9, respectively, and will be utilized as the baseline for this Agreement.</p>
<p>3) Provide for management commitment and worker participation.</p> <p>Develop a construction management / contractor / OSHA relationship that will encourage involvement of all Project subcontractors to improve safety and health performance.</p> <p>Effectively control workplace hazards by increasing the number of construction companies with safety and health management systems.</p>	<p>Require all subcontractors to develop and implement a written safety and health program that is specific to the Project.</p> <p>Motivate employers to receive comprehensive consultation visits.</p>	<p>Track and verify the number of subcontractors who have created a written safety program that is specific to the contractor's work on the Project.</p>

Goals	Strategies	Performance Measures
4) Identify and assess hazards in a timely manner.	Conduct jobsite analyses. Perform initial task hazard analyses and update these analyses as project advances.	Track the total number of hazards identified in the jobsite analyses vs. those identified by workers to measure worker involvement in hazard recognition and correction. Track the number of jobsite task hazard analyses, and the worker involvement in the analyses.
5) Prevent and control hazards by implementing innovative strategies to eliminate serious accidents, including the four primary construction hazards (falls, struck-by, caught in, and electrical).	Implement and enforce an ongoing site safety audit program (including daily observations and weekly group site walks) supported by worker participation to increase the number of hazards identified.	Document the number of site safety audits. Document the number of hazards identified during site safety audits. Document the number of hazards and abated during site safety audits. Document and track all injuries and illnesses, including near misses.
6) Provide general safety and health training and job task specific hazard training.	Provide all workers with site specific safety orientation. Support the goal that all superintendents have OSHA 30-Hour training. Support the goal of increasing supervision obtaining the Safety Trained Supervisor Construction (STSC) certification. Provide all workers with weekly toolbox talks.	Document the number of workers and supervisors trained and the number of training hours received. Note: Include orientation, toolbox talks, and 30-Hour courses.

Goals	Strategies	Performance Measures
7) Provide for worker involvement	Provide worker involvement/participation in: Weekly site safety meetings Site safety audits Pre-task planning OSHA initiatives, including the National Fall Prevention Stand-down, Safe and Sound Week, and Mental Health Awareness Stand Down.	Document the number of: Weekly site safety meetings Site safety audits Pre-task planning Workers and subcontractors participating in the OSHA initiatives such as but not limited to the Fall prevention Stand-down, Safe and Sound Week, and Mental Health Awareness Stand Down events.

IV. SAFETY AND HEALTH MANAGEMENT SYSTEM

The General Contractor Entities will use their safety and health management system to collect and analyze injury and illness trends (including near-miss incidents) for all Project subcontractors performing work at the site. This data will be used as a tool to ensure the Project's continual safety and health improvement. General Contractor Entities will manage this portion of the Partnership Agreement by implementing a comprehensive job-site safety and health management system, which includes the following:

1. Complete a risk assessment prior to exposing employees to potential safety and health hazards. This will be accomplished using the General Contractor Entities pre-task planning process.
2. The General Contractor Entities and/or the affected subcontractors will adequately address health-related issues that occur during the Project, with the assistance of OSHA, as needed and as OSHA's resources permit. An effective environmental monitoring program will be implemented to control airborne hazards, such as silica, and will include personal monitoring, employee training, implementation of engineering controls where possible, and the use of respiratory protection when necessary. Previous site-based data will be considered acceptable.
3. Ensure supervisors receive the OSHA 30-hour safety and health-training course for the construction industry as follows:
 - a. Supervisory personnel should possess an OSHA 30-hour card or its equivalent. The General Contractor Entities will work with all subcontractors to provide their safety designee with an OSHA 30-hour card, or its equivalent.
 - b. All workers will receive a site-specific construction safety orientation covering jobsite safety and health issues, procedures related to the work being performed, as well as the requirements outlined in this Partnership Agreement. In addition, employees shall receive training on the content of the risk assessment for operations they will encounter. This may require periodic retraining of employees on the content of the risk assessments as they become relevant due to entering new phases of construction. This material will be provided by the General Contractor Entities to the subcontractor's designated safety representative for completion.

- c. Safety and health training will be provided to all workers in a language they understand. Bilingual Instructors will be contracted to perform this training. A list of instructors will be provided by the General Contractor Entities to all subcontractors to ensure that all workers are effectively trained.
 - d. Other hazard-specific training will be conducted on an as-needed basis.
4. An effective hearing conservation program, including noise monitoring and engineering controls, where possible, will be implemented by General Contractor Entities.
 5. Ensure compliance with the NFPA 70E when working on live electrical equipment, including training and the availability and use of personal protective equipment. A permit system will be implemented whenever work around live electrical systems will be done to ensure the implementation of appropriate protective measures prior to exposure. The permit form includes requirements for pre-task review and lock out/tag out procedures to be followed.
 6. Ensure all equipment capable of amputations is adequately guarded.
 7. The General Contractor Entities will explore the possibilities of extending training opportunities to project subcontractors based on relevance of the topics and availability of space.
 8. Ensure effective programs are employed, consisting of policies and procedures that comply with OSHA's Process Safety Management (PSM) standards as equipment and processes are brought live and on-line at the Project.
 9. Ensure effective programs are employed, consisting of policies and procedures that comply with OSHA's Lockout/Tagout standards, as equipment and processes are brought live and on-line at the Project.

The General Contractor Entities will implement a comprehensive safety and health program that is based on and includes the core elements of OSHA's "Recommended Practices for Safety and Health Programs in Construction," dated October 2016. This may be found at [Recommended Practices for Safety and Health Programs](#). The OSHA's "Recommended Practices" contain seven core elements—management leadership, worker participation, hazard identification and assessment, hazard prevention and control, education and training, program evaluation and improvement, and communication and coordination for employers on multiemployer worksites.

1. Management Leadership

- a. State clearly a worksite policy on safe and healthful work and working conditions, so that all personnel with responsibility at the site fully understand the priority and importance of safety and health protection in the organization.
- b. Establish and communicate a clear goal for the safety and health program and define objectives for meeting that goal so that all members of the organization understand the results desired, and measures planned for achieving them.
- c. Provide visible top management involvement in implementing the program so that all employees understand that management's commitment is serious.
- d. Assign and communicate responsibility for all aspects of the program so that managers, supervisors, and employees in all parts of the organization know what performance is expected of them.

- e. Have the authority to enforce safety rules and regulations. This authority will include provisions to hold subcontractors and employees accountable and, if necessary, remove contractor employees from the job site.
- f. Provide adequate authority and resources to responsible parties so that assigned responsibilities can be met.
- g. Hold managers, supervisors, and employees accountable to meet their responsibilities so that essential tasks will be performed.
- h. Review program operations at least annually to evaluate their success in meeting the goals and objectives so that deficiencies can be identified and the program and/or the objectives can be revised when they do not meet the goal of effective safety and health protection.

2. Worksite Analysis

- a. Conduct and document periodic workplace inspections/audits for the purpose of identifying and correcting safety and health hazards.
- b. Inspections/audits will be conducted as frequently as deemed necessary by the company, but in no case less than once every month.
- c. Analyze any new task, processes, materials, and equipment.
- d. Perform routine pre-task planning.
- e. Provide a reliable system for employees to notify management personnel about conditions that appear hazardous and receive timely and appropriate responses and encourage employees to use the system without fear of reprisal. This system utilizes employee insight and experience in safety and health protection and allows employee concerns to be addressed.
- f. Investigate accidents and "near miss" incidents so that their causes and means of prevention can be identified.
- g. Maintain records of recordable injuries and illnesses as required by OSHA.
- h. Analyze injury and illness trends to identify work practice improvements or material modifications necessary to prevent accidents.

3. Hazard Prevention and Control

- a. Establish, at the earliest time, safe work practices and procedures that are understood and followed by all affected parties. Understanding and compliance are a result of training, positive reinforcement, correction of unsafe performance, and if necessary, enforcement through a clearly communicated disciplinary system.
- b. Provide appropriately sized personal protective equipment.
- c. Maintain the facility and equipment to prevent equipment breakdowns.
- d. Plan and prepare for emergencies, and conduct training and emergency drills, as needed, to ensure that proper responses to emergencies will be "second nature" for all people involved.
- e. Establish a medical program that includes first aid onsite as well as nearby physicians and emergency medical care to reduce the severity of any injury or illness that occurs.

4. Safety and Health Training

- a. Instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his work environment to control or eliminate any hazards or other exposure to illness or injury.
- b. Train workers on fall protection, prevention of electrocutions, caught-between and struck-by accidents.
- c. Ensure select personnel are trained in basic first aid and CPR.
- d. Train personnel in hazard communications.
- e. Make safety data sheets (SDSs) available to any requesting employee.
- f. Train workers in any other aspects that will enable them to do their jobs safely.

5. Worker Involvement

- a. Arrange for and encourage employee involvement in the structure and operation of the program and in decisions that affect their safety and health so that they will commit their insight and energy to achieving the safety and health program's goal and objectives.
- b. Ensure workers are involved in the safety and health program through participation in activities such as safety walkthroughs, weekly site safety meetings, site safety audits, task hazard analyses, incident investigations (as appropriate) and OSHA initiatives, including the National Fall Stand-down, Safe and Sound Week and Mental Health Awareness Stand Down events.

V. PROGRAM IMPLEMENTATION STRATEGIES

The General Contractor Entities and all Project subcontractors will comply with Items 1 through 22 below:

1. Develop and maintain rigorous project safety specifications for use in all contracts.
2. Develop pre-construction hazard assessments on all projects and document existing conditions and proposed control measures.
3. Conduct initial (safety kick-off) meeting with the General Contractor Entities project management, the General Contractor Entities project safety manager(s), and General the Contractor Entities project superintendent(s).
4. Develop a project specific safety management plan prior to the start of their work on the Project that is based on OSHA's "Recommended Practices for Safety and Health Programs in Construction," dated October 2016. This may be found at [Recommended Practices for Safety and Health Programs](#). The OSHA's Recommended Practices contain seven core elements—management leadership, worker participation, hazard identification and assessment, hazard prevention and control, education and training, program evaluation and improvement, and communication and coordination for employers on multiemployer worksites.
5. Support the goal that all the General Contractor Entities field managers working on the Project will have completed an OSHA 30-Hour Construction training course.
6. Conduct weekly contractor coordination meetings and dedicate the first portion of each meeting to discussing project safety. Each meeting will be documented.

7. Provide annual, quarterly, weekly, or daily inspection of equipment as appropriate. Inspections will be documented and records of inspections maintained at the Project sites.
8. Adequately guard all equipment capable of amputation.
9. Provide a site-specific safety orientation to all workers on the Project prior to starting work. The orientation will include providing information on employees' workplace rights and responsibilities.
10. Provide a competent person as required by OSHA standards and regulations.
11. Develop, review, and document trench plans, fall protection plans, emergency response plans, lift plans, and daily job hazard analyses prior to starting work as it relates to the contractor's scope of work.
12. The General Contractor Entities' project management or other designated individuals will conduct daily site safety inspections. All inspection findings and corrective actions will be documented, tracked, and communicated to all levels of workers on the Project.
13. Provide resources for workers and supervisors to complete OSHA 30-Hour training and other general construction safety training, including training on developing task hazard analyses and conducting incident investigations. Training will be provided periodically to protect workers and management. Safety and health training will be conducted in a language that workers understand.
14. Require and ensure that all contractors have effective drug/alcohol policies and procedures.
15. Track and evaluate Project safety performance.
16. Develop and distribute "Lessons Learned" information to other General Contractor Entities-managed projects throughout Region V.
17. Require that health-related issues arising during the construction Project are adequately addressed by the creating contractor with participation by the Project safety manager.
18. Implement an effective monitoring program to assess exposures to health hazards. Control measures will be implemented when exposures exceed permissible exposure limits.
19. Recognize Project subcontractors that demonstrate the ability to provide a safe working environment.
20. Require any contractor using tower or mobile cranes to demonstrate proper working conditions through inspections conducted by qualified crane inspectors prior to use. Documentation of inspections will be maintained at the Project sites.
21. Require that all crane operators are certified and trained to operate the specific crane in use. Documentation to demonstrate competency will be created and maintained at the Project site.
22. Require that all critical lifts be identified and a plan to safely perform the critical lifts be developed and implemented prior to the lift.

VI. PERFORMANCE MEASURES

The effectiveness of this Partnership Agreement will be assessed quarterly, annually, and at the end of the Project through the following performance measurements.

1. Review of OSHA recordable injuries and illnesses to determine the total case incident rate (TCIR), the days away, restricted, transferred (DART), and days away from work rates (DAFW) for the Project site and compare to the most recently published BLS rate for NAICS 23.
2. The applicable number of employers, supervisors, and employees trained. Records will also be maintained for those that receive 30-Hour training. All Project subcontractors will be required to conduct and document weekly safety toolbox talks.
3. The number of safety and health programs instituted.
4. Outcome measures will be gathered monthly and will incorporate data to analyze the number of hours worked, number of injuries, illnesses, fatalities, and serious hazards found as a result of onsite audits, job site inspections, and OSHA inspection activity.
5. Job site inspections will indicate the number of hazards observed and corrected by the General Contractor Entities and each affected contractor.
6. Near miss incidents and first aid cases will be tracked.

VII. ANNUAL EVALUATION

1. The Partnership will be evaluated on an annual basis using the Strategic Partnership Annual Evaluation Format measurement system as specified in Appendix C of Directive Number CSP 03-02-003, OSHA Strategic Partnership Program for Worker Safety and Health.
2. General Contractor Entities is responsible for gathering the data to evaluate and track the overall results and success of the partnership program.
3. The OSHA Strategic Partnership (OSP) evaluation committee is responsible for writing and submitting the annual evaluation report. See section IX for committee identification.

VIII. OSHA VERIFICATION PROCEDURES

1. Verification Enforcement Inspections:

OSHA will conduct the initial verification enforcement inspection no sooner than three months, but within four months after Partnership participants formally enter into this Agreement. During this period, Partnership participants should develop and implement the safety and health management systems required under this Agreement. After this period, OSHA will conduct verification enforcement inspections annually thereafter. Verification enforcement inspections will be conducted as a focused inspection, per the appropriate OSHA guidelines. Compliance Safety and Health Officers (CSHOs) who are familiar with the Project will do verification enforcement inspections. Employee rights under the Occupational Safety and Health Act (OSH Act) will be afforded. During the verification enforcement inspections, if OSHA personnel identify serious hazards that site management refuses to correct, the scope of the inspection may be expanded.

2. Complaint/Referral Investigations:

This Partnership provides for the immediate response to each allegation of a safety or health hazard brought to its attention by any person. Upon finding that an allegation is valid, the employer shall

promptly abate the hazard.

OSHA agrees that a copy of each non-formal complaint/referral related to the work site and filed with OSHA will be forwarded by fax, or by CSHO, to the General Contractor Entities field office on-site. In accordance with applicable law, the name and identifying information of a complainant requesting confidentiality will not be revealed. The General Contractor Entities agrees to investigate these complaints, regardless of the employer involved, and provide OSHA with a written response within 5 working days of receiving the non-formal complaint/referral.

3. Accident Investigations:

Employers engaged in this Partnership recognize that OSHA fully investigates accidents involving fatality or serious physical harm. If during the course of the investigation OSHA determines that the incident resulted from violations of the OSHA standards, the employer will not be afforded Partnership incentives.

4. Non-enforcement verification:

Onsite non-enforcement verification consisting of a worksite review will be conducted as part of the quarterly partnership meeting, as resources allow. A union representative can choose to be part of the inspection group. In cases of Pandemics such as; COVID-19, off-site verification 'visits' may be performed.

IX. INCENTIVES

Participant benefits from OSHA may include:

1. Maximum penalty reductions for good faith and history, to the extent allowed by the OSHA Field Operations Manual (FOM), OSHA Instruction CPL 02-00-164 (April 14, 2020).
2. In the event that a citation with penalties is issued, the Area Director has the authority to negotiate the amount of an additional penalty reduction as part of the informal conference settlement agreement, which is consistent with OSHA's current policy regarding this matter.
3. Priority consultation service and assistance for small employers working on the construction site from the Wisconsin Onsite Consultation program. In the event OSHA opens an investigation on the job site, all consultation activity will cease until the investigation is closed or the citations are in final status.
4. An OSHA-focused inspection is available where the Partnership participant has an effective safety and health management system fully compliant with 29 CFR Part 1926.20 and 29 CFR Part 1926.21 (For additional details refer to the Focused Inspection in Construction August 22, 1994, memo signed by then Deputy Assistant Secretary for OSHA James Stanley, which was revised on September 20, 1995).

X. OSP MANAGEMENT AND OPERATION

A. The General Contractor Entities will:

1. Establish a Project safety walk-around team and safety committee (Safety Committee), consisting of a representative from each of the primary subcontractors on-site. The General Contractor Entities will also develop and implement a mindset based on a belief that all accidents are preventable and unnecessary. Additionally, the General Contractor Entities will implement a comprehensive safety and health management system, which includes:
 - a. Management commitment and employee involvement.
 - b. Hazard analysis.
 - c. Hazard control; and
 - d. Arrangement of training assistance for other stakeholders on-site.
2. Mentor subcontractors in safety and health management systems. Subcontractors shall include all multi-tiered subcontractors that arrive for work on the site.
3. Ensure that the Project complies with the OSHA silica standard, where the potential for airborne silica exposure exists. To the extent feasible, personal air monitoring will be conducted to assess employee exposure levels. Where the potential for other health issues exists (i.e., carbon monoxide, lead, or large-scale use of chemicals in the building interior during floor finishing), the General Contractor Entities will coordinate with the subcontractor responsible for creating the hazard and ensure that air monitoring is conducted to assess employee exposure levels. Sampling results will be compiled and tracked by the General Contractor Entities.
4. Enforce safety rules and regulations. This enforcement authority includes holding subcontractors and workers accountable for following safety rules and regulations and, if necessary, removing contractor's workers and supervisors from the job site, following proper disciplinary procedures.
5. Ensure that a competent person completes pre-task planning for all fall, struck-by, caught-between, and electrocution hazards. The probability and severity of occurrence for each identified hazard will be evaluated to eliminate or reduce the risk through conventional protection, engineering, or administrative controls to as low a level as possible.
6. Identify and correct serious ergonomic hazards.
7. Ensure that ground fault circuit interrupters (GFCI) are used to protect all electrical circuits that are installed for work. All subcontractors will ensure that employees are protected using a GFCI at all times.
8. The General Contractor Entities superintendents and safety professionals will serve as points of contact, monitor safety and health at the site and evaluate progress toward achievement of the Partnership goals.
9. The General Contractor Entities superintendents and project managers will ensure that daily safety audits are conducted.
10. Conduct and document jobsite safety meetings/toolbox talks on a weekly basis.
11. Coordinate and conduct a comprehensive site audit led by the Project Safety Committee. The Safety Committee and subcontractors will participate in the site safety audit as required. Non-compliant activity or hazards will be corrected immediately. The General Contractor Entities will document the corrective action taken and share this information with OSHA during the quarterly update meetings.

12. Continually evaluate the Partnership's effectiveness and make recommendations for improvement.
13. Require the use of properly fitting personal protective equipment (PPE). Standard PPE includes, but is not necessarily limited to, hardhats, high-visibility clothing, task appropriate gloves, and eye protection.
14. Ensure that all signs and warnings are posted in appropriate languages.
15. Implement a 100% Fall Protection Plan for all work performed 6 feet or more above lower surfaces.
16. Implement an effective Heat Illness Prevention Program to educate workers about the hazards of working outdoors in the heat and steps needed to prevent heat-related illnesses. This should utilize tools such as OSHA's Heat Safety Tool Smartphone App and the Employer Guide to Using the Heat Index.

B. Subcontractors will:

1. Appoint a representative to the Project Safety Committee who will be responsible for resolving job safety matters and serving as a liaison to the General Contractor Entities' superintendents. Every prime subcontractor will have a person available to participate in the Safety Committee. Participation on this committee will consist of, but will not be limited to, participation in the project safety walk-around and monthly safety meetings.
2. Conduct jobsite safety inspections for those employees under their supervision and authority. These jobsite safety inspections will be in addition to the daily general inspections. If non-compliant activities or hazards are discovered, immediately corrective action is required. Documentation of abatement methods and verification will be made available upon request.
3. Share the results of jobsite inspections with all workers.
4. Submit accident reports to General Contractor Entities, including first aid, injury, property damage and near miss reports.

C. OSHA will:

1. Prepare the annual Partnership evaluation. Review and compile data provided.
2. Participate in scheduled Partnership meetings and site non-enforcement walk around.
3. Provide hazard identification and technical assistance as needed.
4. Conduct one enforcement inspection annually.
5. Conduct focused enforcement inspections when applicable.
6. Optimal use of phone and fax process to handle complaints.
7. Other-than-Serious violations will not be cited if corrected at the time of the inspection.
8. Serve as a resource and liaison for Partnership participants and also assist with safety and health training, as resources permit.

D. Wisconsin On-Site Consultation Program will:

1. Appoint consultant(s) to the committee.
2. Participate in monthly on-site safety and health inspections, as consultant availability permits.
3. Provide/assist in training, as resources permit.
4. Provide industrial hygiene and safety consultation services, upon request.

XI. WORKER AND EMPLOYER RIGHTS

This partnership does not preclude workers and/or employers from exercising any rights provided under the OSH Act (or, for federal workers, 29 CFR 1960), nor does it abrogate any responsibility to comply with rules and regulations adopted pursuant to the Act.

XII. TERM OF PARTNERSHIP

It is understood that this Agreement shall be in effect until August 27, 2027. If OSHA or the General Contractor Entities choose to withdraw their participation in the partnership, the entire agreement is terminated.

Any signatory may also propose modification or amendment of the agreement. If any of the other signatories wish to withdraw their participation prior to the established termination date, a written notice of the intent to withdraw must be provided to all the other signatories

XIII. SIGNATORIES

**United States Department of Labor
Occupational Safety & Health Administration**

Based upon a mutual interest in protecting construction workers, the parties below agree to the above terms on the OSHA / General Contractor Entities. Partnership Agreement for the Vantage Data Centers – Project Lighthouse Project in Port Washington, WI.

The date of this Agreement is May 7, 2026

OSHA Occupational Safety and Health	OSHA, Milwaukee Area Office Signature: _____ Printed Name: _____
Turner McCarthy	Turner McCarthy Joint Venture Signature: _____ Printed Name: _____



The Weitz Company

Signature: _____

Printed Name:



The Whiting-Turner Contracting Company

Signature: _____

Printed Name:

Wisconsin Consultation

Wisconsin On-Site Safety and Health Consultation Program

Signature: _____

Printed Name: