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I. General

The Behavior Based Safety program involves employees observing one another while performing job tasks and then making note of safe and at-risk behaviors. These behaviors are then discussed with the aim to improving work-place behaviors. Behavior Based Safety has contributed to a reduction of injuries across Company operations.

II. Introduction

Behavioral Based Safety, otherwise is also referred to as Behavioral Safety or BBS, is simply the use of behavioral psychology to promote safety. The Company has developed a Behavioral Safety Program in order to reduce work injuries and accidents. This is the Company's Behavioral Based Safety Program. We have written a systematic process that will be ongoing and defines a limited set of behaviors that will reduce the risk of work-related accidents and injuries based on the collection of data, on the frequency of critical safety practices, and then ensuring that feedback and reinforcement encourage and support those critical safety practices.

III. Purpose

GALLANT BUILDERS attempts to ensure that our employees have a work environment free from recognized hazards. The purpose of this program is to provide guidelines for conducting behavior-based observations.

IV. HSE Policy Coordinator

The Safety Coordinator is the program coordinator, acting as the representative of GALLANT BUILDERS owners, who have the ultimate responsibility for all facets of this program. The Safety Manager is the sole person authorized to amend these instructions. GALLANT BUILDERS has authorized the Safety Manager and any Supervisor or Employee to halt any operation of GALLANT BUILDERS where there is danger of serious personal injury. Supervisors are required to ensure their employees are aware of the contents of this program and have received the basic awareness training before their assignment to work.

V. Written Program

Behavior Based Safety program will be implemented throughout the Company to reduce occupational injuries and accidents. The Behavior Based Safety program involves employees observing one another while performing job tasks and then making note of safe and at-risk behaviors. These behaviors are then discussed with the aim to improving work-place behaviors. Behavior Based Safety has contributed to a reduction of injuries across Company operations.

VI. Observation Training

The Company will assign the **Safety Coordinator,** who will be in charge of training all Level 5 employees. All Level 5 field employees will be trained in the proper observation process for the 'Behavioral Based Safety' Program as

established by the Company. The **Safety Coordinator** will initially be involved in training the Level 5 field employees as stated.

- Level 5: Management/Supervisor or more than 2 years field experience.
- Level 4: Field experience of more than 1 year but less than 2 years.
- Level 3: Field experience of more than 6 months but less than 1 year.
- Level 2: Field experience between 4 weeks and 6 months.
- Level 1: New employee less than 4 weeks field experience.

Level 1 employees will go through an orientation training program to apprise them of the hazards and issues that will and may be experienced. Employees will be made aware that they will be observed at any time. Each employee will wear their respective level training number on their hard-hat or safety vest and be clearly visible. These visible numbers or the training levels will also ensure that all employees have a general awareness and understanding that the Company is serious about safety.

Refresher training will be done each time an employee moves into the next tier of experience. Level 5 training or Supervisor training will be conducted on a semi-annual basis or if a serious injury occurs. The training will either be done in the field or in the classroom depending on the training exercise. All employees who are working out in the field will be involved in the training.

This training will include:

- Program objectives and incident metrics reviewed.
- How to conduct the observation.
- How to complete the observation form.
- Feedback training and role play with mentoring and coaching.
- What the behaviors mean.

Employee's awareness of observations conducted by all personnel at any

VII. Conducting Observations

The behavioral based safety process calls for employees and supervisors to conduct observations of employees' performing their regular work duties and provide feedback to associates and management within their work areas. These worker observations provide data that is used for problem recognition, problem-solving, and continuous improvement. These observations will provide direct measurable information on employees' work practices identifying both safe and unsafe behaviors or actions. The observer will also provide feedback to the employee(s) observed at the time of the safety observation.

VIII. Job Observation Program

The Job Observation program is used to identify behaviors (Safe or At Risk) on jobsites by peers evaluating peers. Through this process the Company will be able to determine "Safe" or "At Risk" behaviors on a job specific basis and take a proactive approach to modify behaviors which influence attitude and drive continuous improvement. The Safety Advisor or Superintendent will hold a meeting to explain the job observation process to all employees.

- This is a tool which will measure safe and at-risk behaviors.
- Job observations should be documented for both safe and at-risk behaviors so it can be a proactive tool and not a fault finding medium.
- All employees on the job should be informed of this process so the level of awareness of safe and at risk behaviors is achieved.

Pre-Job Plan

- Determine frequency for completion of job observation report.

Job Observation Checklists

- Select employees that are trained to use programs and issued checklists as required.
- Employees are required to complete checklists based on observations made on specific tasks.
- Observations
- Reinforcement (R/C) Correction
- Follow-up Action
- Checklists are to be turned in to the supervisor at the end of the day

Complete the Job Observation Report

- Supervisor is to fill in the report on a pre-determined basis (weekly, monthly, and end of job, etc., and forward to the training and safety department for completion of the trend analysis (graphical representation of observations).
- Retain checklists for duration of job and destroy

Trend Analysis

- Once completed by the training and safety department, analysis will be forwarded to the head office. This is a tool for use at tailgate, safety meetings and joint work site committee meetings to focus attention on behaviors which are safe and at risk on jobsites. (What is working and what needs to be improved).

Observation Checklist Guidelines

DECIDE:

1. **When** you are going to audit (should try for different times of the day if possible)?

2. **Where** you are going to audit (if you can't cover the entire area in the time you have allowed, make sure you vary locations)?

3. **Who** you are going to audit (are there any workers you want to pay specific attention to because of high hazard severity, high accident frequency, or workers who you've observed before working unsafely)?

STOP

1. Are you coming to a complete stop immediately after entering area - giving your complete and undivided attention to the people working?

OBSERVE:

1. Did you observe the area of responsibility for 10 to 20 seconds before moving along?

2. Did you look for unsafe acts and employee-created unsafe conditions?

3. Did you also look for repetitive strain and other ergonomic risk factors?

ACT:

1. Did you properly approach each employee, introducing yourself (if appropriate)?

2. Did you ask the employee to STOP working and step a few feet away from the job, explaining the interruption (doing a safety inspection)?

3. Did you get his undivided attention?

4. Did you use the 'Questioning Attitude/Approach'?

5. If an unsafe act was observed, did you ask the:

   a) What if… and 2) How could … type questions?

6. Did you listen to the employee?

7. Did you talk with the employee? (equal time)

8. Did you take immediate corrective action? (if appropriate)

9. Did you help prevent the recurrence of the unsafe act? (if one was observed)

10. Did you explain how and when you would follow-up? (if appropriate)

11. Did you help improve safety judgment?

12. **If no unsafe act was observed,** did you check and talk with an employee about (at least 2 of the following):

a) Personal Protective Equipment (check glasses, hat, gloves, etc.)
b) Tools (Including Toolbox)
c) Equipment or Machinery being used
d) Procedures (Including Emergency)
e) Orderliness (General Comment on Housekeeping)

13. Did you complete the inspection (or were you distracted)?

Observation Feedback

After completion of an observation, the observer or Level 5 employee will have a discussion with the lower-level tiered employee to get feedback.

The observer or Level 5 employee will perform the following:

- Review the observation with the observed or lower tiered employee.
- Start with positive comments.
- Reinforce safe behaviors observed first.
- Describe and discuss what was unsafe.
- Solicit from the observed employee explanation of his or her unsafe behavior with open-ended questions. During this time the observer will re-emphasize that there are no consequences for his or her explanation.

Data Collection and Trend Analysis

As we all know safety is our main and primary concern. The Company will collect and maintain all data and forms with the Responsible **Safety Coordinator**. Each individual department will submit all data and forms to the Responsible **Safety Coordinator** for company analysis. The Responsible **Safety Coordinator** will maintain this data in order to compare measurements and track results. This information will then be processed in a manner that a report or reports may be generated with numerical and statistical comparisons can be made over time. We will be able to leverage our data and observation into actionable knowledge to reduce injuries.

IX. Action Plan

Once a trend analysis is complete the Company will implement action plans in order to address unsafe behaviors. **The Company action plans will include the following points:**

- Evaluate unsafe behaviors from trend analysis and prioritize
- Develop action plan for unsafe behaviors based on comments and feedback from data sheets
- Designate responsible parties and timeframes within the action plan
- Define who is responsible for action planning

- Ensure management support

Follow-Up Action Plan
The Company action plans will be carried out over the course of a set time period, depending on the severity of the unsafe observed action. This time period will be up to the discretion of the **Safety Coordinator**. Follow-up will be performed to ensure the closure and correction of all actions listed within the
Action Plan.

The Follow-Up Action Plan Process will include:

- The Company will ensure proper maintenance and support of the new process by conducting follow-up observations monthly for the first three months and again at the end of the first six months.
- The **Safety Coordinator** will be in charge of the education and skill-development as the Company continues to implement and further develop additional modules on analyzing data, problem solving and action planning, enhancing participation, and the use of reinforcement. As the Company compiles, analyses and further develops correction plans we will continue to move toward ZERO injuries.
- That all action plans, forms and anything pertaining to the use, implementation and correction of any and all action plans be archived for at least 7 years for data review and analysis.

X. Definitions

Behavioral Based Safety (BBS) - The application of science of behavior change to real world problems or a process that creates a safety partnership between management and employees that continually focuses people's attentions and actions on theirs, and others, daily safety behavior. BBS focuses on what people do, analyzes why they do it, and then applies a research-supported intervention strategy to improve what people do. At its very core BBS is based on a larger scientific field called organizational behavior management. In a safety management system based upon the hierarchy of hazard control, BBS may be applied to internalize hazard avoidance strategies or administrative controls (including use of PPE), but should not be used in preference to the implementation of reasonably practicable safety measures further up the hierarchy.