Table of Contents

I. PURPOSE 2
II. SCOPE 2
III. RESPONSIBILITIES 2
IV. ORIENTATION 2
IV. SAFETY TRAINING 3
VI. SPECIFIC REQUIREMENTS 3
VII. MEDICAL AND FIRST AID 3
VIII. FIRST AID / CPR 4
IX. EMERGENCY PHONE NUMBERS 4
X. POSTINGS AND SIGNS 4
XI. PERSONAL PROTECTIVE EQUIPMENT 4
XII. SPECIFIC SITE MANAGEMENT DUTIES AND RESPONSIBILITIES 4
XIII. ACCIDENT / INCIDENT MANAGEMENT 5
XIV. SUBSTANCE ABUSE PROGRAM 5
XV. CLAIMS MANAGEMENT 6
XVI. PRE-TASK PLANNING / JOB HAZARD ANALYSIS 6
XVII. SUBCONTRACTOR SAFETY COMPLIANCE 6
XVIII. SUBCONTRACTOR PRE-CONSTRUCTION SAFETY MEETINGS 7
XIX. CRISIS MANAGEMENT 8
XX. ENVIRONMENTAL PROGRAM 8
XXI. CONTRACTUAL RISK MANAGEMENT CONTROLS 8

EXECUTIVE SUMMARY OF GALLANT BUILDERS SH&E PROGRAM

This Gallant Builders Safety, Health and Environmental (SH&E) Manual contains safety standards, which, are mandatory for all Gallant projects. It is the responsibility of each subcontractor on Gallant projects to comply with the OSHA 1910 and 1926 standards, all state, federal, EPA and other applicable standards to ensure safe and efficient operations.

For detailed information on the safety standards below and any specific program information, reference the Gallant SH&E Manual.

MANAGEMENT SUPPORT

I. PURPOSE

Loss Prevention is a key element of Gallant's commitment to conducting its business in an environment that protects the health, safety, and well-being of our employees, owners, subcontractors, vendors, suppliers, and the community in which we work.

II. SCOPE

During the execution and delivery of our services, Gallant will consistently conduct its business in a manner that carefully considers the hazards that exist and the conditions in which the work will be undertaken.

SH&E PROGRAM AND PROCESSES

III. RESPONSIBILITIES

All Employees, in conjunction with the Safety Department, are responsible for providing and maintaining a safe and healthy work environment that is designed to safeguard the well-being of all employees and ensure safe, efficient operations. For specific safety regulations and requirements, consult the OSHA Standards and the Gallant SH&E Manual.

IV. ORIENTATION

Project staff will participate in a project start up orientation and appropriate plan review to discuss:

- Specific site safety rules including site security
- Gallant Builders Safety business plan goals and how they apply to the project
- How to actively promote employee involvement in improving safety performance on the job
- Implementing an on-site safety team
- Frequency of site inspections and evaluation of the reports with corrective action
- Written reports needed for the project
- Hazard Communication Program implementation, Chemical Inventory List and Safety Data Sheets (SDS)
- Safety Incentive programs
- Meeting to discuss claims reviews on any open claims

- Training requirements for staff
- New employee orientations
- Housekeeping standards
- Use of Safety Standards, Best Practices, JHA databases
- CCIP administration (if CCIP job)
- Subcontractor Management

V. SAFETY TRAINING

A plan should be put in place to address what specific training should be done for salaried and hourly employees. These programs may include but are not limited to:

- OSHA 10/30 hour (staff, hourly, subcontractors)
- Crisis Management (staff)
- Use of knowledge databases (Best Practices, Policies and Procedures, SH&E Manual, Job Hazard Analysis)
- Activity specific Job Hazard Analyses
- Drug and alcohol program
- Hazard communication program
- Accident/Incident reporting
- Fall protection program

VI. SPECIFIC REQUIREMENTS

It is the responsibility of each subcontractor to ensure safe operations and participate in complying with the following as applicable:

- Department of Labor Occupational Safety and Health Regulations for Construction Parts 1926 and 1910 (the General Industry Standards applicable to construction)
- Gallant Builders SH&E Manual
- US Army Corps of Engineers-Safety & Health Manual EM 385-1-1
- Applicable ANSI Standards
- Applicable EPA Regulations
- Applicable Owner Specific Requirements

VII. MEDICAL AND FIRST AID

Determine the appropriate medical facilities that the insurance companies recommend for your project's location; then, contact the medical facility and arrange a meeting to discuss:

- Gallant Builders' policies and return to work initiatives, required services, and operating hours
- Modified or light duty restrictions
- Medical facility's procedures (When and how the facility reports on the treatment)
- Gallant Builders drug screening program: laboratory, forms, shipping of specimens, reporting and costs for collecting specimens

- Forms
- Shipping of specimens
- Reporting
- Costs for collecting specimens
  - Billing procedures and insurance company information (the project office must be billed for specimen collection)

VIII. FIRST AID / CPR

Certified First Aid/CPR Personnel will be on site. Contact the local Red Cross or the Gallant Safety Director for information about training courses.

IX. EMERGENCY PHONE NUMBERS

Display a completed emergency telephone number placard near each telephone in your office.

X. POSTINGS AND SIGNS

Display applicable general posters and notices on bulletin boards in an area accessible to all Gallant Builders employees (see SH&E Manual). Required posters will vary according to state.

XI. PERSONAL PROTECTIVE EQUIPMENT

All applicable OSHA standards will be followed. Hard hats are required at all times. Fall protection is required per OSHA standard. Specific company standards may exceed OSHA standards but must be spelled out in the site specific plan.

XII. SPECIFIC SITE MANAGEMENT DUTIES AND RESPONSIBILITIES

1. Maintain the OSHA 300 Forms and the Project Injury Log in his or her office.
2. Post safety posters on the bulletin board and throughout the jobsite as required. Obtain a starter package of safety posters from Loss Prevention; protect posters from the rain so that they remain in good condition, and replace them regularly or when they are damaged.
3. Verify the Hazard Communication Program, including the written program, Chemical Inventory List and Safety Data Sheets (SDS) for Gallant Builders and all subcontractors, and complete training required for the project. Subcontractors must notify Gallant Builders of any hazardous materials they will use and have a written Hazard Communication Program. Subcontractors are responsible for training their own employees.
4. Conduct new hire orientation for Gallant employees. Review employee hiring and sign-up procedures as well as associated forms, including:
   - Safety Orientation
   - Substance Abuse Policy
   - Drug-free Awareness Program
   - Hazardous Communication Program
   - OSHA 1926 standard compliance and where Gallant Builders exceeds OSHA

standards.

5. Establish and review emergency action plans for the project, including fire, serious injury, and crisis management, with the project's staff and subcontractors.
6. Verify the subcontractor safety program before each subcontractor begins work. Determine who will be the subcontractor's safety representative and competent person(s).
7. Each project should have a project safety team that is comprised of the Gallant Builders designated loss prevention coordinator, superintendent, and subcontractors competent person/designated safety coordinator. The team should meet periodically to walk the job and should hold safety management meetings to go over pre task planning issues, multi-employer work site issues, and safety violations. Corrective action should take place immediately on the jobsite with hazardous activities.
8. Address the following safety programs and job hazard analysis items for each project:
    - Erosion of excavation until backfill **(Gallant requires that proper safety measures be taken on any excavation over 4' in depth)**
    - Fall protection **(Gallant requires that fall protection be provided at greater than 6' in height across every trade)**
    - Housekeeping and clean up
    - Illumination
    - Confined Space Entry
    - Visitors
    - General Public Protection
    - Disciplinary Action Program
    - Cranes and Hoists **(Gallant requires anti-two block on all cranes)**
    - Temporary electrical receptacles have approved ground fault circuit interrupters.
    - **Gallant prohibits assured equipment grounding programs on all projects.**

Note: 16 gauge extension cords and flat cords are prohibited.

XIII. ACCIDENT / INCIDENT MANAGEMENT

All injuries, both first aid and serious, as well as any property damage shall be **REPORTED TO Gallant IMMEDIATELY**. An accident form should be filled out immediately. All accidents requiring treatment at a medical facility will require a post-accident drug screen for the injured person and any witnesses. All positive drug screens will be cause for removal of employee from the jobsite.

A written report should be completed and sent to the Project executive and Safety Director.
Feedback should be provided to the jobsite staff and craft workers. In the event of a fatality Gallant Builders shall be notified immediately and the crisis management plan implemented.

Review procedures with the project staff for reporting accidents, including:

- Accident Report
- Other required forms (as applicable)

XIV. SUBSTANCE ABUSE PROGRAM

To help ensure a safe, healthy, and productive work environment for the employees of Gallant and others on Company property, to protect Gallant Property and assets and to assure efficient

operations, Gallant has adopted a program on drugs, alcohol and other prohibited items. All employees are required to be drug tested every two years. Gallant strictly adheres to a nine panel drug screen for pre-hire, post-accident, random, and reasonable suspicion. Alcohol testing is to be done for post-accident, random and reasonable suspicion but is discretionary for pre-hire.

Any employee found using illegal drugs or alcohol on the job, or found with such in his or her possession on the job, will be subject to immediate removal from the jobsite. All employees shall be subject to search of his or her person and possessions if the company has reason to believe that he or she may be in possession of such contraband.

All firearms including legally permitted firearms, ammunition, explosives and other lethal weapons are prohibited on company property or in parking areas.

XV. CLAIMS MANAGEMENT

In the event of a work related injury/illness to an employee, it is the company's philosophy to: ensure they receive proper medical treatment, assist in returning the employee to a productive work environment in a timely fashion and provide proper compensation while off the job.

It is the responsibility of the Safety Director to manage the claim for the company and stay in constant contact with the claims adjuster, jobsite staff and make recommendations for settlement. It is the responsibility of jobsite management to keep in contact with either the claims adjuster or the Safety Director regarding any new developments in the claim.

The following liability policies apply to your project:

- Workers' Compensation
- General Liability
- Automobile Liability

XVI. PRE-TASK PLANNING / JOB HAZARD ANALYSIS

The purpose of accident prevention preplanning is to prevent unnecessary hazards that are likely to occur during construction and to make sure each Contractor performing an operation will have the necessary material, equipment, and properly trained workers on hand when needed.

It is the responsibility of the Gallant Site Management to ensure that pre-task planning--job hazard analysis and safety task assignments are implemented for all divisions of work operations and activities performed on the project. A plan must be implemented and the individual workers given their safety task assignment before any phase of work is to begin on the project.

XVII. SUBCONTRACTOR SAFETY COMPLIANCE

Employees of Subcontractors, Suppliers and other third parties, while on Gallant projects and in the performance of their work, shall comply with all safety and health regulations established by Gallant, OSHA and all Federal, State and local codes and regulations.

Subcontractors, who in turn contract parts of their work, have the **total responsibility** to see that their **lower tier contractors** comply with these requirements. Where there is a conflict between codes, laws, regulations, contracts and programs, the more stringent shall apply.

Gallant reserves the right to remove from Company Property, any employee found in violation of safety rules or policies.
Each trade contractor working on the project is contractually obligated (see Exhibit I) to comply with all statutory safety requirements including OSHA, EPA, State, Federal, local, and Gallant requirements.

Subcontractors Safety Program must be substantially similar to or exceed the Gallant SH&E Program and the contractual requirements of Exhibit I.

XVIII. SUBCONTRACTOR PRE-CONSTRUCTION SAFETY MEETINGS

The Subcontractor's on-site Supervisor and the Subcontractor's designated on-site Safety Representative must schedule and attend a Pre-Construction Safety Meeting with the Gallant Builders Project Safety Representative to discuss the Subcontractor Safety Requirements. The Pre-Construction Safety Meeting should take place at least five (5) working days before startup to allow for review of required documentation. The Pre Construction Safety Meeting may be held in conjunction with a General Pre-Construction Meeting.

The Pre-Construction Safety Meetings will include as a minimum:

- A review of the safety section(s) of the contract
- The Gallant Builders Subcontractor Safety Package Requirements
- Executive Summary of Gallant's SH&E Program
- Job Hazard Analyses
- Drug and alcohol program
- Hazard communication program, Chemical Inventory List, Safety Data Sheets
- Accident/Incident reporting
- Housekeeping on the project
- EPA program
- Fall protection program
- Participation in on site safety team
- Attendance and participation in safety meetings
- Identification of competent persons, including first aid and CPR trained individuals
- Interpreters for non-English-speaking workers
- Employee safety training, including but not limited to:
- **Hazard Communication Training** - 29 CFR 1926.59.
- **Stairway and Ladder Safety Training** - 29 CFR 1926.1050.
- **Fall Protection Training** - 29 CFR 1926. 503
- **Personal Protective Equipment** - 29 CFR 1926.95
- **Scaffold Training** - 29 CFR 1926.450
- **Steel Erection** - 29 CFR 1926.750
- **Excavation** - 29CFR 1926.650
- Other safety submittals, and applicable Subcontractor specific safety programs

XIX. CRISIS MANAGEMENT

Everyone performing work on the project should be familiar with the Gallant Builders Crisis Management Program, posted emergency procedures for fire, medical, and environmental emergencies.

Procedures governing actions to be taken in the event of a serious injury, property damage, or catastrophic incident must be established and updated or expanded as the work progresses. Emergency procedures will include necessary actions to be taken, who will take them, names of persons to be notified, and the location of emergency equipment and supplies. The Crisis Management Plan should be shared with everyone working on site.

XX. ENVIRONMENTAL PROGRAM

All State, Federal, and city EPA requirements will be complied with on the project for maintaining a written Storm water Pollution Prevention Plan for Construction under the storm water regulations (40 CFR 122). A site specific plan will be written for the project.

The Superintendent or designated representative is responsible for conducting periodic site evaluations. The Superintendent or designated representative is responsible for updating the storm water plan as needed and incorporating into the plan any necessary changes resulting from major changes in the site's activities.

The Project Manager and/or the Superintendent are responsible for keeping records of all inspections and reports.

XXI. CONTRACTUAL RISK MANAGEMENT CONTROLS

1. All subcontractors working on site must have the proper insurance certificates in place prior to starting work and comply with all contract requirements.

2. Good housekeeping is an important element of accident prevention. It should be a primary concern to all superintendents and foremen. Good housekeeping should be planned at the beginning of the job, carefully supervised and followed to final cleanup. Most construction jobs are large enough to have a regular or composite cleanup crew, and this is recommended.

3. All subcontractors must submit timely accident/incident reports to the on-site safety representative.