Table of Contents

1. Purpose 2
2. Scope 2
3. Roles and Responsibilities 2
   - **3.1. Construction Managers / Project Managers / Site Managers and Gallant Site Leadership** 2
   - **3.2. Superintendents / General Foreman / Foreman** 2
   - **3.4. Front Line Employee** 2
4. General Requirements 2
5. Definitions 4
7. Forms / References 4

1. Purpose

1.1. To ensure our employees recognize to effect of fatigue as related to safely being able to perform work and to establish guidelines for work hours and equipment to reduce fatigue in our business and at our client locations.

2. Scope

2.1. This program applies to all Gallant Builders Gallant), projects and operations. Must review client requirements.

3. Roles and Responsibilities

3.1. Construction Managers / Project Managers / Site Managers and Gallant Site Leadership

3.1.1. Management accepts responsibility for the implementation of this fatigue risk management policy.
3.1.2. Holds final approval in the exceptions process.

3.2. Superintendents / General Foreman / Foreman

3.2.1. Works with management to ensure this policy is fully understood and adhered to.
3.2.2. Initiates the exception process as needed and required in the process outline below.
3.2.3. Monitors front line employees for signs of fatigue and continuously evaluate fitness for duty.
3.2.4. Uses administrative controls such as schedule adjustments and employee rotation to proactively mitigate fatigue risk.

3.3. Site Safety

3.3.1. Works with management and leadership to ensure this policy is fully understood and adhered to.
3.3.2. Routinely audits the policy implementation for accuracy and compliance.
3.3.3. Assists as needed int the exception process.

3.4. Front Line Employee

3.4.1. Employees will comply with the requirements outlined in this policy.
3.4.2. Employees will report any external fatigue risk they are experiencing.
3.4.3. Employees will report to work fit for duty.
3.4.4. Employees are responsible for working with their leadership to ensure compliance with work hours in work sets.

4. General Requirements

4.1. All Gallant Industrial Employees will comply with the following Hours of Service Expectations as defined in Table One

Table 1 Hours of Service Expectations

Hours of Service Expectations Operational Situation	**Normal Operations**	**Outages**
Maximum Hours		
a) per Shift	14 hours	14 hours
b) per Work Set	92 hours	182 hours
Minimum time off after a work set		
a) Work set of 4 or more night shifts	46 hours	
b) Work set that did not include 4 or more night shifts	34 hours	
C) Outages	34 hours	
Call-Outs		
a) Minimum Time between Shifts	8 hours	8 hours

4.2. Exception Process

4.2.1. Exception Process

4.2.1.1. The Superintendent / General Foreman will initiate the process by requesting via email approval to work outside of the Hours of Service expectations above. The email approval request must include at minimum.

4.2.1.1.1. Project Manager / Construction Manager (PM/CM).

4.2.1.1.2. Safety person responsible for the site.

4.2.1.1.3. Reason for the exception request.

4.2.1.1.4. Safeguards to prevent fatigue risk before the minimum time off between work sets.

4.2.2. The exception will need to be approved by the Site Operational Leader (PM/CM) and the safety person responsible for the site.

4.3. Other requirements aimed at fatigue reduction.

4.3.1. Ergonomically friendly equipment will be utilized when available.

4.3.2. Employees are required to take breaks to prevent mental fatigue.

4.3.2.1. 15 Minute Break each 2.5 hours

4.3.2.2. 30 Minute Break each 5 hours

4.3.3. No Employee is permitted to physically lift greater than 50lbs solo. Any lift of >50lbs requires team lifting techniques.

4.3.4. Employees must not chronically use over-the-counter, prescription drugs, and any other product which may affect an employee's ability to perform their work safely.

4.4. Training Requirements

4.4.1. All Gallant Industrial employees will be trained on the requirements of this policy.

5. Definitions

5.1. **Extended shifts** – Work periods greater than 14 hours regardless of the scheduled shift length.

5.2. **Normal operations** – Operations that are not during outages.

5.3. **Outages** – The beginning of an outage is considered when shifts have been altered from normal schedule due to a turnaround, unit shutdowns, or operational responses. The end of an outage is considered when shifts have returned to normal work schedules and work rest cycle has been completed.

5.4. **Process Safety Sensitive Activities** – Activities that are taking place within Process Safety Management covered areas or with PSM covered equipment and/or activities that could cause a process safety event at the Facilities if not performed correctly.

5.5. **Shift** – Four or more consecutive hours worked, regardless of the nature of the work.

5.6. **Work sets** – Work that takes place between minimum required rest periods. One work set can include consecutive or alternating shifts, day and/or night shifts.

6. Forms / References

6.1. API RP 755, 2nd ed