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I. INTRODUCTION

It is GALLANT BUILDERS's policy to conduct its business in a manner that addresses the safety of employees, contractors, customers and the communities we serve. GALLANT BUILDERS will strive to prevent all incidents, accidents, injuries and occupational illnesses through the active participation of all stakeholders. The company is committed to continuous efforts to identify and manage safety risks associated with its activities.

Accordingly, **GALLANT BUILDERS's policy is to**:

- Encourage and Support:
- Employee Engagement in Workplace Safety;
- A Total Safety Culture;
- Care for Employees;

Maintain infrastructure and equipment, establish documented safety management systems, provide training and conduct operations in a manner aimed at safeguarding people and property;

Communicate with employees, contractors, communities and customers with respect to their roles and responsibilities surrounding rail safety.

Comply with all applicable laws, regulations, rules and instructions.

Respond quickly, effectively, and with care to emergencies, accidents, or incidents in cooperation with authorized government agencies;

Undertake appropriate reviews and evaluations of its operations to measure progress, foster compliance with this policy and continually improve.

II. TRAINING AND COMPLIANCE

All Personnel must be trained in accordance with all regulatory and GALLANT BUILDERS safety requirements prior to performing work. GALLANT BUILDERS is responsible for ensuring all Personnel have in their possession any required identification, certifications and licenses necessary when performing work for GALLANT BUILDERS.

Personnel who perform safety-related railroad work for GALLANT BUILDERS must ensure that all employees are trained and qualified to comply with any relevant railroad safety laws, regulations, and orders, as well as any relevant railroad rules and procedures promulgated to implement those railroad safety laws, regulations, and orders.

Appropriate training based on complexity of the job and potential hazards related to in plant rail shall be provided to all applicable employees. Assessments shall be used to determine whether the personnel have the knowledge and have demonstrated skills to safely perform their work assignments.

Retraining and testing shall be required for unsatisfactory/unsafe performance of job assignments.

III. GENERAL SAFETY REQUIREMENTS

- GALLANT BUILDERS requires it's contractors to follow the same safety rules that govern GALLANT BUILDERS employees. These include, but are not limited to, requirements related to work gear, equipment, and safety conduct, reporting, prohibitions against weapons, drugs & alcohol, and fires.
- Railroad management is authorized to take any actions necessary to prevent injuries to any person, damage to railroad property, disruption of railroad operation, and the safety of the public.
- GALLANT BUILDERS is responsible for the safety of our personnel. Subcontractors, and any vendors or material/delivery drivers working on behalf of the GALLANT BUILDERS shall be responsible for the safety of their personnel.
- Our personnel & contractor personnel must be familiar with and obey all rules, regulations, and instructions applicable to their duties and work location prior to performing work. All personnel shall be trained on the Site/ Facility Specific Safety requirements prior to starting a project.
- All personnel shall be prepared to work in compliance with all applicable standards and requirements.
- Any questions regarding this information should be directed to the GALLANT BUILDER's project manager in charge of the work location.

IV. CORE RESPONSIBILITIES

ALL PERSONNEL ARE EMPOWERED TO WORK SAFELY AND MUST:

- Be responsible for personal safety and accountable for their behavior;
- Correct or protect any unsafe condition or practice and report to proper authority;
- Maintain situational awareness;
- Work within the limits of physical capabilities. Excessive force must not be used to accomplish tasks;
- Comply with instructions pertinent to their work responsibilities.

INSTRUCTIONS, RULES AND STANDARD WORK:

Copies of our Client/ Owner's and our In Plant Safety Rules, General Code of Operating Practices, standard work, site-specific directives can be obtained from our project management team in charge of each work location. Any questions or concerns should be addressed to the project manager in charge of each work location.

IDENTIFICATION AND PERMISSION TO ENTER WORK SITE:

- All GALLANT BUILDERS employees and Contractor personnel must have a valid contractor badge applicable or readily show identification showing employment with the Contractor.
- All Personnel must conduct themselves in a safe manner that does not expose GALLANT BUILDERS, themselves or any other person to risk of property damage and /or personal injury. This includes compliance with all GALLANT BUILDERS AND Client/ Owner rules related to working on or around tracks and equipment.
- Permission granted to enter upon Client/ Owner premises will be used solely in connection with an authorized purpose and will terminate once that purpose is accomplished.

WORKING IN CLOSE PROXIMITY TO A RAIL CAR:
Never attempt to crawl under rail equipment or climb over moving rail equipment or attempt to cross in front of moving equipment.

Never position any part of the body in a potential pinch point. Rail equipment can move in either direction at anytime.

Prior to performing work within six (6) feet of any railroad track, permission must be obtained from railroad Supervisor/Designated person to take the track out of service.

JOB BRIEFINGS:
Must be conducted with all individuals involved in the task before work begins and if the work plan or work group changes.

THE JOB BRIEFING MUST:

- Consider existing and potential hazards that might be involved as a result of:
  - Weather,
  - Scope of work; and
  - Tools and equipment.
- Identify PPE requirements.
- Review electronic device use restrictions.
- Assign responsibility.
- Explain group / individual assignments, while considering abilities and experience.
- Be aware of work groups and equipment in work area.
- Identify job location.
- Verify understanding of instructions and assignments.

FOR COMPLEX JOBS:

- Brief only a portion of the job, and
- Conduct additional briefing(s) as the job progresses.

PERSONAL PROTECTIVE EQUIPMENT AND PROPER ATTIRE:

- Be approved by the Safety Department;
- Only be used as intended;
- Be used where conditions of the job require and in accordance with rules; instructions, or
- directions from supervisor;
- Not be altered or used if altered.

Anyone entering designated areas or working near others wearing PPE must also wear the required PPE. Keep all PPE issued in good condition, properly fitted, and replace as required in order to maintain the intended protection. Wear clothing that allows the person to perform duties safely and efficiently. Contractors must wear PPE high visible outerwear.

CLOTHING MUST NOT:

- Interfere with vision, hearing and free use of hands and/or feet;

- Block peripheral vision. When hooded sweatshirts and/or coats or similar type clothing are worn,
- they must be secured around the face to prevent the blocking of peripheral vision;
- Be torn, baggy, ragged, loose, or worn so that it could snag easily or catch on cars, engines, tools, machinery or other equipment but must allow freedom of movement. This includes neckties or similar clothing.

WHEN WORKING OUTSIDE, ALL PERSONNEL MUST WEAR:

- Pants that cover the legs;
- Shirts with at least quarter-length sleeves that cover the back, shoulders, chest, abdomen and provide protection from sun, insects, abrasions or scratches.

Jewelry that may affect one's safe performance of their duties must not be worn.
Hair, including beards, must be worn in a manner to permit safe performance of duties.

MINIMUM PPE REQUIREMENTS:

All personnel shall wear approved hard hats, approved metatarsal boots and approved safety glasses with permanently attached side shields shall be worn as required in designated areas.

USE OF ELECTRONIC DEVICES:

All Personnel shall not use an electronic device while on duty if that use would interfere with the performance of safety-related duties.

The GALLANT BUILDERS rules regarding electronic device use apply to all Personnel. The rules do not affect the use of railroad radios under FRA regulations.

All Personnel authorized to use work-related electronic devices are prohibited from using such devices when:

- In a red zone or work location where safety sensitive duties are being performed.
  Red Zone is defined as: Anytime an employee is working within an area where there is the potential to be struck by moving equipment, when required to work on under or between equipment, when working with or around machinery or when entering control operator/train dispatcher work stations;
- Operating any equipment;
- Any Contractor Personnel are on the ground fouling the track or on moving or rolling equipment;
- Anyone is assisting in preparation of a train, engine or on-track equipment for movement.
- It is necessary to verbally obtain or release mandatory directives when radio communication is available;
- Fueling a vehicle;
- Standing or walking on a roadway.

Unless required to be powered on for purposes of timely, automated updating or transmission of information, work-related electronic devices must be powered off with any earpiece removed from the ear, and stowed when not in use.

Operators of over the road trucks, passenger vehicles and repair type vehicles are permitted to use cell phones only when a hands free device is used along with voice activated or speed dialing or when parked in designated

parking areas. The use of a cell phone for anything other than voice communication is prohibited while operating a motor vehicle.

Use of electronic devices is permitted only in break areas, office areas or in parked passenger or over the road type vehicles in designated parking areas. Gate lanes are not designated parking areas for this purpose.

FIRE PREVENTION:
No open fires are permitted on railroad property or in connection with any railroad project or activity. Fire prevention is accomplished by:

- Maintaining good housekeeping;
- Not allowing the accumulation of combustible materials and debris;
- Ensuring that fire doors, windows, stairways, fire escapes, passageways, and roadways are in good condition, not blocked, and free from obstruction;
- Maintaining access to firefighting equipment;
- Ensuring that catalytic converters, exhaust systems, and exhaust gases do not come in contact with dry grass, weeds, or flammable material.
- Immediately correct and/or inform a supervisor of a potential fire hazard.

SMOKING:
Smoking, including the use of electronic smoking devices, is prohibited at the following locations and activities:

1. All property, whether owned or leased, including mechanical facilities, along the right-of-way, in office buildings, and all service unit facilities and yards;
2. In or near building entrances and contiguous sidewalks;
3. In locomotive cabs, cabooses, bunk cars, company vehicles, and similar equipment;
4. In meetings held at off-site locations.

REPORTING:
All cases of personal injury, while on duty or on company property, must be **immediately reported** to the proper manager. All cases of occupational illness must be **immediately reported** to the proper manager.

V. VEHICLE OPERATIONS

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.

SEAT BELTS:

ALL VEHICLE OCCUPANTS MUST USE SEAT BELTS, WHERE PROVIDED. THIS INCLUDES:

- Company vehicles;
- Privately-owned vehicles used on company business;
- Leased, rented or contract vehicles;

- Hi-rail vehicles on and off the rail;
- Operating material handling or utility type vehicles, if so equipped (i.e. forklifts, mobile cranes, mules, utility trucks, etc).

The driver must not move a vehicle until assured all passengers are seated and have their seat belts fastened in proper restraining position.

EXCEPTION:
Seat belt use is not required if vehicle is not exceeding 5 mph and vehicle is used during the task of inspecting cars, coupling air hoses or changing brake shoes.

VI. DRIVER RESPONSIBILITIES

DRIVERS ARE REQUIRED TO:

- Know and observe all local, state, and federal laws and regulations governing vehicle operation;
- Use courtesy, consideration, and common sense to prevent accidents and control situations encountered that cannot be provided for in the law;
- Obey posted speed limits. Not to exceed a safe and prudent speed for their vehicle when weather, traffic, road conditions, vehicle load or any other prevailing conditions necessitates operating at a lower speed;
- Ensure that required emergency equipment and tools are in the vehicle.
- Maintain good housekeeping;
- Ensure loose items are not kept on the dash or rear window shelf;
- Ensure tools, equipment, material and freight are properly secured;
- Ensure Gross Vehicle Weight Rating (GVWR) of vehicle is not exceeded;
- Ensure headlights or running lights are on while vehicle is moving.

Drivers must not drive when suffering fatigue, lack of sleep, illness, or any other physical condition which may affect alertness and ability to operate the vehicle safely.

OPERATING YARD VEHICLES:

Only qualified, authorized drivers are permitted to operate yard vehicles. Compliance with other vehicle rules including speed and inspection also apply to operating all vehicles. Reckless or careless driving is prohibited. Operators of vehicles must not:

- Make adjustments or disable any speed limiting devices;
- Park the vehicle foul of any railroad track;
- Park vehicle to foul a portion of a roadway unless proper warning to approaching traffic is provided;
- Cut through empty parking stalls;
- Pull through parking stalls;
- Cross over yellow crane safety distance lines;
- Drive under or park under overhead cranes;
- Enter a protected work area;
- Pass any vehicle on the right side of the roadway.

BACK-UP MOVES:

Work must be planned to minimize back-up moves and to avoid driving into areas requiring backup moves. No back-up move is allowed when a forward move can safely be made. Employee(s) in the cab of a vehicle must not distract the driver with unnecessary conversation or other distractions until the back-up move is completed. Before initiating a back-up move, the driver must walk to the rear of the vehicle to confirm that it is safe to move unless a second person is directing the move.

CROSSINGS:

Drivers must approach railroad crossings prepared to stop. Before crossing track(s) where visibility is impaired by railroad equipment or other obstruction that prevents a clear view of approaching trains, the driver of the vehicle must:

- Stop the vehicle and verify (by either a flagman or personal observation) there will be no movement on the track(s) being crossed, or
- Use an alternate crossing.

Vehicles designed to transport 16 or more passengers including the driver or placarded vehicles must stop at all highway railroad crossings at grade.

Drivers must stop before proceeding over any crossing within a yard. This includes crossings where no stop sign is posted. Only one stop is required for multiple crossings.

In all cases pedestrians/employees shall cross at existing designated pedestrian rail crossings where provided. Additionally, vehicle crossings are not intended as pedestrian crossings unless they are so identified and/or located, and no other pedestrian crossings exist in the area.

If a designated railroad track crossing is not available, do not cross within 10 feet of the end of a parked rail car, do not cross between uncoupled cars, stop, look and listen prior to proceeding across the tracks, and never step on rails, as they may be slippery.