Table of Contents

I. PURPOSE 2

II. TOP MANAGEMENT INVOLVEMENT 2

III. ASSIGNMENT OF SPECIFIC SAFETY ACTIVITIES TO SUPERINTENDENTS AND MANAGERS 2

IV. MEASURE, EVALUATE AND COMMUNICATE 3

V. PRE-LOSS ACCOUNTABILITY SYSTEMS 3

VI. MANAGEMENT PARTICIPATION 3

VII. WORKER OBSERVATIONS 4

Gallant Builders (Gallant) has implemented this program to provide our Superintendent's with the necessary guidance for safety accountability on all Gallant projects.

I. PURPOSE

The purpose of this program is to define the safety accountability standards and expectations of the Gallant Superintendent's.

II. TOP MANAGEMENT INVOLVEMENT

Gallant Builders (Gallant) believes that management plays a critical role in establishing and maintaining our safety culture. Gallant's upper management and operations management is totally committed our safety culture, SH&E Program and the safety of everyone involved in our projects.

Gallant shall ensure that employees at all levels will be held accountable for accident prevention results just as they are held accountable for other company results such as production. Some of the actions that can be taken by top management include:

- Assign specific safety responsibilities to the management team
- Allocate sufficient budget and resources to the safety program
- Make safety the first agenda item in all management meetings
- Allow all managers the time and resources to perform their safety responsibilities

Maintain visibility – occasional attendance at safety meetings reinforces top management's commitment and support.

III. ASSIGNMENT OF SPECIFIC SAFETY ACTIVITIES TO SUPERINTENDENTS AND MANAGERS

Each member of the management team should be assigned safety and health related activities that must be performed and that will be monitored and measured. Examples include:

- Holding regular safety meetings.
- Performing employee safety training and re-training.
- On-going hazard identification and correction.
- Completion of job hazard analyses including daily pre-job planning.
- Defined safe job practices such as housekeeping, personal protection, proper lifting practices or mandate the use of machine safeguarding.
- Participation in accident investigations.
- Motivating and rewarding employees for safe behavior
- Consistent enforcement of safety rules and safe work practices.
- Proper and complete documentation of safety efforts.

- Effective injury management activities such as Early Return to Work efforts.

IV. MEASURE, EVALUATE AND COMMUNICATE

Gallant shall define and measure safety results as a specific element in all performance evaluations. Up-stream and leading safety indicators will be the focus of the Superintendents daily and monthly work activities. Gallant shall commit to the following:

- Equal attention and weight shall be given to safety performance results as is given to quality, productivity and customer service
- Salaries, bonuses and incentives shall be directly tied to safety performance
- Good performance shall be rewarded
- Opportunities for improvement will be communicated and measurable goals will be set

Accountability is the keystone of our Safety and Health Program and is a key element of our accident prevention strategies.

Gallant believes that it is paramount that the standards and expectations be established for safety. The successes will be rewarded and there will be consequences for poor performance and results.

V. PRE-LOSS ACCOUNTABILITY SYSTEMS

Gallant shall implement a pre-loss accountability system to measure loss prevention activities and results before an incident, accident or near miss event occurs. There are many types of pre-loss accountability systems. Gallant focuses on management involvement and accountability as well worker field observations.

VI. MANAGEMENT PARTICIPATION

The Gallant Safety Accountability Program is based on management participation in the daily safety activities of each project. Management is responsible for participating in up-stream / leading indicator safety and health activities.

The Gallant safety accountability program will measure management's involvement in these safety tasks / activities:

- Attending monthly company safety meetings
- Holding weekly project safety meetings
- Conducting employee safety training sessions
- Conducting weekly workplace safety inspections
- Conducting monthly safety tool and equipment inspections
- Conducting field safety observations
- Weekly JHA evaluation and grading

In this type of system participation targets are set for each activity. For example, all managers may be required to hold monthly safety meetings, conduct daily job safety talks, inspect their workplace for hazards each month, and

complete accident investigations within 24 hours following the time of loss. Each manager would be required to submit or maintain documentation supporting the completed activities. Safety audits can be performed to validate results. Safety bonuses can be awarded on how well a manager participates in these activities.

VII. WORKER OBSERVATIONS

In a worker observation based accountability system it is critical to identify and measure key predictors of loss. For example, statistics show that 80% of worker injuries result from unsafe acts. An accountability measure based on counting the number of observed safe worker practices would be an example of a good pre-loss accountability system tied to loss prevention. In establishing a fair and effective observation system it is important to define the desired behaviors that will be measured. If a firm's goal is to reduce material handling injuries through adoption of proper material handling practices, then an account-ability measure would be the number of times proper material handling practices are observed over a period of time. If a goal is to reduce eye injuries through the use of eye protection, then a measure would be to count the number of times this behavior is observed.

In order to make this accountability fair, observations should be completed over a period of time for all participating business units to establish a baseline. Impartial individuals such as your safety department staff should complete these observations. Upon development of this baseline information, improvement targets can be set. Impartial individuals would then count the number of times the desired behavior is observed over a period of time.

In the following example, the goal was to improve safe material handling practices by 50%. Safe material handling practices include any of the following behaviors:

- Use of proper lifting and carrying techniques for loads less than 50 lbs.
- Obtaining assistance to handle loads greater than 50 lbs. but less than 100 lbs.
- Use of lifting aids such as dollies or carts
- For loads greater than 100 lbs. – requesting assistance from crane, lift truck or pallet jack operators