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I. INTRODUCTION

The Gallant Builders Safety and Health Management System (SHMS) has been developed to provide a systematic approach to safety and health in order to have an incident free culture of safety.

II. SCOPE

The Gallant Builders Safety & Health Management System applies to all operations conducted by Gallant Builders. Any new acquisition, project, joint venture or contract controlled by Gallant Builders shall follow its requirements.

III. TERMS AND DEFINITIONS

Audit — the systematic and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.

Audit Program — a set of one or more audits planned for a specific time frame and directed towards a specific purpose. Note: An audit program includes all activities necessary for planning, organizing, and conducting the audits.

Competence — demonstrated ability to apply safety and health management system knowledge and skills.

Continual Improvement — the process of enhancing the safety and health management system to achieve ongoing improvement in overall safety management performance.

Contractor — an organization or individual providing services to another organization in accordance with agreed-upon specifications, terms, and conditions.

Document — a medium containing information related to the safety and health management system.

Employee — a person employed by the organization or a person under the day-to-day control of the organization.

Employee Representative — a non-managerial employee who is:

(a) a representative of other employees according to the requirements of law or collective agreements; or

(b) selected by non-managerial employees for other reasons.

Ergonomics — integrated knowledge derived from the social and technical sciences, used to match jobs, systems, products, and environments with the physical and mental attributes of the people involved.

Hazard — a source of potential harm to an employee.

Incident — an occurrence, arising in the course of work, that could result in an injury or illness (includes near misses).

Legal Requirements — requirements of applicable OHS federal, provincial/territorial, and municipal laws, regulations, and bylaws, and where applicable, provisions of the organization's collective agreements that relate to health and safety

Organization — a Gallant Builders, operation, undertaking, establishment, enterprise, institution, or association, or a part or combination thereof, that has its own management. An organization may be incorporated or unincorporated, public or private.

Other Requirements — other occupational health and safety provisions to which the organization subscribes.

Procedure — a documented method to carry out an activity.

Process — a set of interrelated or interacting activities, that transforms inputs into outputs.

Record — a document that states results achieved or provides evidence of activities performed.

Risk — a combination of the likelihood of the occurrence of a hazardous event and the severity of harm caused by the event.

Safety and Health Management System (SHMS) — part of the overall management of the organization that addresses occupational, health and safety hazards and risks associated with its activities.

System — a set of interrelated or interacting elements.

Workplace Parties — managers (including supervisors), employees, and employee representatives.

IV. SAFETY AND HEALTH MANAGEMENT SYSTEM ELEMENTS

The following is a general listing and description of the Gallant Builders Safety and Health Management System (SHMS) elements and their application.

1.0 GENERAL REQUIREMENTS

1.1 Leadership and Commitment

1.1.1 Management Commitment and Leadership

Senior management of Gallant Builders shall provide leadership for safety and health activities and assume overall responsibility for the SHMS. This responsibility includes:

- Establishing, actively promoting, and maintaining the SHMS;
- Providing appropriate financial, human, and organizational resources to plan, implement, check, review, and correct the SHMS;
- Defining roles, assigning responsibilities, establishing accountability, and delegating authority to implement an effective SHMS;
- Establishing and implementing an safety and health policy and measurable objectives;
- Reviewing the organization's SHMS at planned intervals;
- Ensuring that employees and employee representatives are consulted; and
- Encouraging active participation on the part of employees and contractors in the establishment and maintenance of the SHMS.

1.1.2 Management Representatives

The Gallant Builders senior management shall, if warranted due to Gallant Builders workforce size, designate one or more representatives of management who, irrespective of other responsibilities, shall have defined roles, responsibilities and authority for ensuring that this SHMS is established, maintained and reviewed to support:

- Effective processes to identify and eliminate or control work-related hazards and risks;
- Reporting on the performance of the SHMS to senior management, employees, and employee representatives (if present) as appropriate for review and as the basis for improvement.

1.1.3 Employee Participation

Employee participation is an essential aspect of the SHMS. Gallant Builders shall provide employees and employee representatives, if warranted due to Gallant Builders workforce size, with time and resources to participate effectively in the development of the safety and health policy and in the process of SHMS planning, implementation, training, evaluation, and corrective action; and encourage employee participation by providing mechanisms that:

- Support employee participation, such as identifying and removing barriers to participation;
- Establish workplace health and safety committees or employee representatives where required by legislation and, where applicable, collective agreements or other requirements; and
- Ensure that employees and employee representatives are trained in, and consulted on, all aspects of SHMS associated with their work.

1.1.4 Commitment Statement

The Gallant Builders Safety and Health Management System (SHMS) is driven by leadership and commitment from senior management and its readiness to provide resources for SH&E matters. Gallant Builders is committed to providing a productive, safe and healthy work environment for our employees, contractors, clients, customers and visitors.

Our commitments are communicated to all employees, contractors and suppliers and include:

- To instill a corporate culture where harm to our staff through work is totally unacceptable;
- To be proactive in assessing health, safety and environmental hazards for new business, new and existing work systems, practices and equipment;
- To encourage team problem solving at all levels of the organization to implement work practices that continually improve safety, environmental standards and productivity;
- To report and investigate incidents and implement systems and practices that prevent reoccurrence;
- To ensure compliance with legal requirements and industry standards;
- To train managers and employees to competently perform work described in safe work procedures;
- To provide information to all employees, contractors and customers that inform them of health safety and environmental issues relevant to Gallant Builders operations;
- To ensure products are safe and without adverse environmental impact.
- All Gallant Builders staff have a responsibility for implementing this safety and health management system by striving to achieve a zero tolerance towards hazards, incidents and injuries.
- We continuously improve safety and health management by setting objectives, plans and performance measures and regularly reviewing progress against the targets set.
- We involve our staff in safety and health management through training and by contributing in identifying, assessing and controlling hazards.

2.0 POLICY

OBJECTIVE

The objective of the Gallant Builders Safety & Health Policy is to state its commitments to provide safe and healthy working conditions. It outlines the steps that are taken to meet these commitments and provides the framework for the Gallant Builders Safety & Health Management System.

RESPONSIBILITIES

Corporate Management

Adopts the Gallant Builders Health & Safety Policy and all legal requirements; Requires that the policy be distributed to all operations for display;
Supports the implementation of the policy throughout all operations.

Managers and Supervisors

Discusses the policy during induction orientation;
Communicates the requirements of the policy to all employees through safety & tailgate meetings; Ensures the posted policy is current and easily visible.

All Employees

Comply with the requirements of the policy and support implementation of the policy.

2.1 Procedure

In consultation with employees and employee representatives, Gallant Builders shall establish and maintain the safety and health policy and shall ensure that the policy:

- Is appropriate to the nature, scale, and safety and health hazards and risks associated with Gallant Builders activities;
- Includes a commitment to comply with applicable safety and health legal requirements and other requirements;
- Includes a commitment to protect employees and to ensure continual improvement;
- Provides the framework for setting and reviewing safety and health objectives and targets;
- Is documented, implemented, and maintained;
- Is posted and communicated to all employees;
- Is available to external interested parties, as appropriate;
- Is discussed during safety meetings on an as-needed basis and is included in all site specific SH&E plans which are received by employees; and
- Every year the policy is reviewed for relevance and appropriateness to our Gallant Builders and amended as appropriate and disseminated again.

2.2 Health and Safety Policy Statement

We are committed to comply with all applicable safety and health legal requirements. We are committed to our guiding principles which include ensuring that Safety, Health and Environment is First – never compromise on the health and safety of our customers and our people and to manage responsibly the impact that our business has on the environment. The following points summarize our employee's commitments to Health and Safety:

- Comply with Health and Safety regulations and related Gallant Builders policy and procedures.
- Use all required personal protective equipment where indicated.
- Decline to operate any machinery or equipment without proper instruction regarding safety and general operation.
- All employees shall report unsafe conditions and/or hazards to their supervisors promptly.
- Follow all Gallant Builders Safety Procedures and Practices.
- Promptly report all injuries/incidents and work related diseases and actively participate in the Return to Work process in accordance with our Return to Work Policy.
- Attend all required health and safety training.
- Follow safe work instructions and assist in prevention.

All Gallant Builders Managers and Supervisors are committed to take ownership of their areas of responsibility by ensuring that the following important activities occur:

- Accept direct responsibility and accountability for all matters relating to Health and Safety for the employees and/or contractors they supervise directly and/or indirectly.
- Deal promptly with employees' Health and Safety concerns and advise employees of actual and potential hazards that
  are known by the manager or supervisor.
- Maintain and ensure transfer of knowledge of all duties and obligations under all relevant legislation, client requirements and Gallant Builders policies and procedures.
- Ensure that employees use Personal Protective Equipment as prescribed in addition to following all safety procedure and practices.
- Provide appropriate training in use of equipment, safe work practices and procedures and handling of hazardous materials.
- Ensure that all contractors, suppliers, vendors and other visitors adhere to all Gallant Builders policies and procedures.
- Investigate accidents/incidents and perform workplace inspections.
- Review any accident investigation and facilitate the corresponding corrective action plan.
- Assist any injured employee to the fullest possible extent including facilitating the Return to Work process in accordance to our Corporate Return to Work policy.
- Continue to improve our safety and health management system and operational standards in all sites.
- Take every other reasonable precaution to protect employees.
- Implement and enforce Health and Safety rules, regulations, policies, procedures and prescribed instructions.

This policy is to be posted in all Gallant Builders facilities by the site supervisor.

2.3 Environmental Policy Statement

Gallant Builders recognizes that environmental concerns are of critical importance. Gallant Builders encourages its employees to join with the Gallant Builders in full acceptance of and compliance with this policy. We will create procedures that fully comply with federal, state and local regulations. We will provide adequate training to our employees to ensure our workers are aware of these procedures and are capable of following them.

Protection of the Environment
We will employ practical measures to protect the environment. We will conserve and protect the water, air, and land resources we use. We will strive to eliminate any releases to land, air or water that may harm human health or the environment. Continuous improvement in our environmental performance will be a principal objective.

Waste Management Policy Statement
We will work to prevent waste and pollution at the source whenever possible. New facilities and improvements of existing operations will use processes designed to minimize the environmental effects of our operations and will incorporate functional pollution control equipment.

Recycling and Waste Disposal
We will support recycling programs where practical and will use environmentally safe treatment and disposal practices for waste that is not eliminated at the source or recycled.

Compliance
We will manage existing facilities so that we meet or exceed legal requirements. We will implement programs and procedures to satisfy compliance. We will conduct compliance audits and monitor procedures and practices to evaluate our performance.

Disclosure
We will inform our employees of our progress in environmental issues. We will cooperate with the authorities and regulatory agencies in responding to inquiries. We will encourage our employees to report to the Gallant Builders conditions that they reasonably believe could be harmful to the environment or pose health or safety hazards so the Gallant Builders can initiate prompt corrective actions.

Commitment
Management will consider the environmental and cultural implications of its decisions. This policy is to be posted in all Gallant Builders facilities by the site supervisor.

2.4 Drug and Alcohol Policy Statement

Any employee or contractor on duty or on Gallant Builders property who possesses, sells, receives, is impaired or is determined to have measurable levels of any alcohol or illegal drug in their blood or urine (no matter the amount), post drug/alcohol screen, will be subject to immediate disciplinary action or contract dismissal.

Any employee or contractor involved in a job related incident while on duty or involving Gallant Builders equipment will be subject to a post-incident drug/alcohol screen.

If an employee or contractor returns to work following an absence of more than 90 days a return to work screening shall occur. Follow up drug screening shall be applied when appropriate as determined by management.

We reserve the right to conduct random drug and alcohol screenings on employees and contractors who perform safety-sensitive functions, such as driving Gallant Builders property or entering any worksite. Additionally, we also reserve the right to conduct unannounced random drug and alcohol screening on employees or contractors entering any worksite. We will require an employee or contractor to submit to a drug/alcohol screen if we have reasonable suspicion to believe that he/she has violated the prohibitions concerning alcohol and/or controlled substances based on observations concerning the appearance, behavior, speech or body odors of that person.

Contractors or employees maintaining or using prescribed medications shall report the circumstances and effects to their supervisor. Some types of medications could have undesirable effects, and these can create a safety risk and endanger other contractors.

Periodically, unannounced inspections will be made of persons entering or leaving Gallant Builders work sites by authorized Gallant Builders representatives. Entry onto Gallant Builders or client property is deemed to have provided consent to an inspection of a person, locker, vehicle, or any other personal effects.

Any refusals to submit to a drug/alcohol screen will be treated as a positive test, resulting in immediate contract dismissal or disciplinary action, up to and employment termination. The contractor or employee refusing to submit to the test will be asked to sign a refusal document. If they refuse to sign the document, it will be noted and kept on file.

Drug and alcohol screening will be performed by an approved and qualified medical clinic with a medical review officer authorized to perform the tests. All results are treated with confidentiality.

If another contractor or employee comes to management with concern regarding another contractor or employee in reference to alcohol or substance abuse, we will treat that with discretion and confidentiality. We will pursue investigation and decide accordingly whether a drug and or alcohol screen is the appropriate step to take.

All contractors and employees are subject to the policies explained above. This policy is to be posted in all Gallant Builders facilities by the site supervisor.

3.0 PLANNING

OBJECTIVES

To identify, assess, record and control risks in the workplace for routine and non-routine activities while ensuring employees are involved during risk management processes;

To eliminate, as far as is practicable, the risk of human injury, illness or damage to property;

To promote planning as a means of achieving continuous improvement in our safety and health performance by utilizing risk management procedures when establishing our annual safety and health objectives.

RESPONSIBILITIES

Safety Director

Introduces planning and risk management procedures and assists site managers with implementation; Determines risk levels for identified hazards and continually reviews legal and other requirements; Utilizes risk management procedure results when establishing annual safety and health objectives.

Managers and Supervisors

Implements planning and risk management procedures and ensures employees are involved.

Employees

Provide input to risk identification and assessment and follow risk control procedures.

SH&E PLANNING PROCESS OVERVIEW

3.1 Hazard Identification

OBJECTIVES

- To provide guidelines for identifying workplace hazards;
- To ensure the potential hazards of new processes and materials are identified before they are introduced into the workplace;
- To identify the jobs/tasks which require risk assessment.

RESPONSIBILITIES

Safety Director, site managers, supervisors and employees as identified specific reference procedures and safety programs.

HAZARD IDENTIFICATION PROCEDURE

Gallant Builders operations personnel notify the Safety Director if a new project is to begin. The Safety Director then conducts a baseline worksite hazard assessment which identifies the various tasks that are to be performed and the actions to be taken to correct the identified hazards. Inputs into the baseline hazard identification include, but are not limited to:

- Scope of work
- Legal and other requirements
- Previous incidents and non-conformances
- Sources of energy, contaminants and other environmental conditions that can cause injury
- Walk through of work environment

3.1.1 Defining Hazards

A hazard is anything with the potential to harm life, health or property. Classifications of workplace hazards are divided into six groups:

- Physical hazards such as noise, electricity, heat and cold
- Chemical hazards such as toxic gases, noxious fumes and corrosive liquids
- Ergonomic hazards such as the height of a workbench, the shape of a vehicle seat
- Radiation hazards, for example, from x-ray machines, high powered lasers, radioactive materials
- Biological hazards such as syringes containing potentially

infected blood, etc. Hazards identifications (as examples) are to include:

- Working Alone
- Thermal Exposure
- Isolation of Energy
- Hearing Protection
- Musculoskeletal Disorders
- Bloodborne Pathogens
- Confined Spaces
- Driving
- General Safety Precautions

3.1.2 Identifying Hazards

A complete inspection of all work site tasks will be carried out by the Safety Director in conjunction with employees. This will develop an inventory of all of the tasks conducted throughout the work site. Examples of types of tasks: grinding metal samples; transporting material from one area to another; decanting and mixing paints and solvents; operating machinery such as cranes, hoists and fork lift trucks; undertaking repair work inside confined spaces (such as holding tanks); undertaking cleaning and housekeeping work or spraying chemicals.

Additional areas for hazard identification include:

- Activities of all persons having access to the workplace including contractors and visitors.
- Infrastructure, equipment and materials at the workplace
- Changes or proposed changes in Gallant Builders, its activities or materials
- Modifications to the SHMS including temporary changes and their impacts on operations, processes and activities.
- The design of work areas, processes, installations, machinery, operating procedures including their adaption to staff capabilities.

3.1.3 Continued Hazard Identification

At existing locations employees shall be continually involved in the identification of hazards. Unidentified hazards are to be reported immediately and assessed for risk. Additional sources for ongoing hazard identification shall include:

Routine Activities

- Job Hazard Analyses
- Field Level Risk Assessments
- Ergonomic assessments
- Industrial hygiene surveys
- Workplace Inspections
- Purchasing and procuring
- Job observations
- Audits

- Document

review Non-routine

Activities

- Accident/incident investigations
- Following emergency situations

It is also necessary to consider future tasks or situations that involve a change to the existing premises or process, or those which are non-routine.

3.1.4 Recording Hazard Identification Data

Once gathered, the hazard identification data will be recorded by the Safety Director on the Worksite Hazard Assessment form. It shall be dated and signed.

3.1.5 Certification of Hazard Assessment

The Safety Director signs the certification portion of Worksite Hazard Assessment Form and includes it within the site specific SH&E plan.

3.1.6 Review of Hazard Assessment

Hazard assessments are formally reviewed annually.

3.2 Risk Assessment

OBJECTIVES

- To assess the risk posed by each identified hazard
- To prioritize the risks so recommended risk controls can be assigned

RESPONSIBILITIES

Safety Director, site managers, supervisors and employees as identified specific reference procedures and safety programs.

3.2.1 Risk Assessment Procedure

Each identified hazard is assessed for risk based on potential consequences of effecting injury to people, damage to assets, the environment or reputation of Gallant Builders. The frequency of risk exposure is then considered.

Following risk assessment steps each risk assessed becomes classified as low, medium or high in accordance with the Gallant Builders Risk Assessment Matrix shown below.

3.2.2 Risk Assessment Matrix

The risk level of the hazard is recorded with the associated task on the worksite hazard assessment portion within the site specific SH&E plan for the job site.

RISK ASSESSMENT MATRIX

FREQUENCY	CONSEQUENCES				
	Insignificant Severity 0 (no injuries; no issue for environment)	Minor Severity 1 (slight health; minor env effect; slight impact)	Moderate Severity 2 (moderate health; localized env effect; work delay)	Major Sevevity 3 (extensive injuries; majef env effect; loss of production)	Catastrophic Severity 4 (multiple fatalies; extensive damage, massive effect)
Almost certain – multiple times a day	Use Risk Controls (Medium)	Use Risk Controls (Medium)	Use Risk Controls (Medium)	Intolerable (High Risk)	Intolerable (High Risk)
Likely – several times in a week	Use Risk Controls (Medium)	Use Risk Controls (Medium)	Use Risk Controls (Medium)	Intolerable (High Risk)	Intolerable (High Risk)
Possible – once a week possibly	Review for Improvement (Low)	Use Risk Controls (Medium)	Use Risk Controls (Medium)	Intolerable (High Risk)	Intolerable (High Risk)
Unlikely – could occur at some time	Review for Improvement (Low)	Review for Improvement (Low)	Use Risk Controls (Medium)	Use Risk Controls (Medium)	Intolerable (High Risk)
Not Performed – work is not performed	Review for Improvement (Low)	Review for Improvement (Low)	Review for Improvement (Low)	Use Risk Controls (Medium)	Use Risk Controls (Medium)

3.3 Risk Control

OBJECTIVES

- To provide guidelines to control identified and assessed risks;
- To emphasize the importance of understanding the hierarchy of controls for the effective elimination of identified risks within our workplaces.

RESPONSIBILITIES

Safety Director, site managers, supervisors and employees as identified specific reference procedures and safety programs.

3.3.1 Hierarchy of Controls

Gallant Builders shall use the following priorities when determining controls to identified hazards:

- Elimination
- Substitution
- Engineering controls
- Signage/Warning and or administrative controls
- Personal Protective Equipment

3.3.2 Risk Controls

Risk assessed hazards are compiled with risk control methods including engineering or administrative controls and PPE required into the Worksite Hazard Assessment of the site specific SH&E plan. No work will begin before the worksite hazard assessment is completed. Additionally, no risk assessed as High (Intolerable) shall be performed.

3.3.3 Emergency Control of Hazards

Only those employees competent in correcting emergency controls of hazards may be exposed to the hazard and only the minimum number of competent employees may be exposed during hazard emergency control. An example is a gas leak in a building. Only those competent personnel with training on fire safety, gas supply shut off and other related controls will attempt to resolve the emergency control of a hazard. Gallant Builders will make every possible effort to control the hazard or under the supervision of client emergency response personnel in every emergency.

3.3.4 Job Hazard Analysis (JHA)

For those jobs with the highest injury or illness rates, jobs that are new to our operation, jobs that have undergone major changes in processes and procedures or jobs complex enough to require written instructions will have a Job Hazard Analysis performed.

3.3.5 Field Level Risk Assessment (FLRA)

Prior to beginning any work task a Field Level Risk Assessment shall be conducted. The senior or designated person of the work team will conduct the FLRA with the participation of other employees. The FLRA shall be documented and submitted to the designated supervisor after the task is completed.

3.3.6 PPE Assessment & Matrix

Personal Protective Equipment shall be identified via the Gallant Builders PPE Hazard Assessment Certification Form which shall be signed and dated by the Safety Director.

3.3.7 Site Specific SH&E Plan

Each work location has a site specific SH&E plan.

Each employee reporting to a location shall receive a documented orientation from a Gallant Builders supervisor that includes the SSHP for that site.

The SSHP contains the Gallant Builders Health and Safety Policy, site specific safety requirements as well as a PPE matrix and a signed site specific worksite hazard assessment for that location, which the Gallant Builders has a responsibility to provide.

3.4 Legal and Other Requirements

OBJECTIVES

- To describe the process developed to identify and have access to legal and other requirements;
- To keep the information up to date and to communicate these requirements to those with compliance responsibilities.

RESPONSIBILITIES

Safety Director

- Identify and ensure access to legal and other requirements.
- Identifies, tracks and monitors legal and other requirements for work performed;
- Provides updates and ensure accuracy and completeness of the Gallant Builders Safety & Health

Compliance Matrix and communicates requirement changes to the Project Managers and Superintendents.

Project Managers and Superintendents

- Notifies the Safety Director of new projects and communicates responsibilities to our employees;
- Communicates facility and operational changes to the Safety Director.

Employees

- Follows all legal and other requirements.

PROCEDURE

Gallant Builders operations personnel notify the Safety Director if a new project is to begin.

The Safety Director then conducts an analysis which identifies the legal and other requirements that apply to the scope of work being performed.

Employees are to have ready access to the current safety and applicable legislation as required. The bulletin board shall be utilized for this purpose.

3.4.1 Legal Requirements

- Regulatory statutes applicable to the jurisdiction
- Hazard or industry specific statutes and regulations
- Municipal laws/regulations/by-laws
- If applicable - Collective Agreements (e.g. those containing provisions for personal protective equipment)

3.4.2 Other Requirements

- Client requirements
- Agreements with contractors
- Industry and trade association codes
- Standards that must be adhered to in the organization – e.g. ACGIH Threshold

Limit Values Identified legal and other requirements are listed on the Gallant Builders Safety &

Health Compliance Matrix.

Legal and other requirements are incorporated into the Worksite Hazard Assessment which is included in the site specific SH&E plan for the project.

3.4.3 Means of Tracking Requirements

Establish means of tracking all of the above (through internet, e-mail, safety bulletin boards etc.)

- Gallant Builders subscribes to those identified information services as required to be continually informed of regulatory scope changes.
- Gallant Builders uses the internet to check on safety and health new or revised legislation for the scope of work being conducted.

3.4.4 Review of Requirements

Legal and other requirements are reviewed annually.

GALLANT BUILDERS' SAFETY AND HEALTH COMPLIANCE MATRIX

ASPECT	LOCATION	CITATION OR STANDARD	COMPLIANCE OBLIGATION OR TASK	FREQUENCY	RESPONSIBLE PARTY	OPERATIONAL CONTROL	RECORDS
Overall Health & Safety	All Operations	29 CFR 1910 29 CFR 1926	U.S. Occupational Safety and Health Standards	Continuous	Entire Organization	Inspections	Training Inspections
Bloodborne Pathogens	All Operations	29 CFR 1910.1030	Employer Shall Establish A Written Exposure Control Procedure	Continuous	Safety Director Superintendent Employee	Bloodborne Pathogens Program	Training SSHP Receipt
Confined Spaces in Construction	All Operations	29 CFR 1926.1200	Requirements To Protect Employees From The Hazards Of Permit-Required Confined Spaces.	Non- Precautionary	Superintendent Employee	Confined Spaces Program	SSHP Receipt
Hazard Communication	All Operations	29 CFR 1910.1200	Ensure That Hazards Of All Chemicals Are Transmitted To Employees.	As New Chemicals Are Introduced	All Employees	HAZCOM Program	Training SSHP Receipt
Personal Protective Equipment	All Operations	29 CFR 1926 Subpart E	Protective equipment shall be provided, used, and maintained whenever hazards are capable of causing injury or impairment to any part of the body.	As Required	Safety Director Project Manager Superintendent Employee	PPE Program SSHP Training	Training SSHP Receipt

ASPECT	LOCATION	CITATION OR STANDARD	COMPLIANCE OBLIGATION OR TASK	FREQUENCY	RESPONSIBLE PARTY	OPERATIONAL CONTROL	RECORDS
Respiratory Protection	All Operations	29 CFR 1910.134	The employer shall be responsible for the establishment and maintenance of a respiratory protection program.	Precautionary	Superintendent Employee	Respiratory Protection Program	SSHP Receipt
Emergency Response Plan	All Operations	29 CFR 1926.35	An emergency action plan must be established and in writing.	As Required	Safety Director	Emergency Response Program	SSHP Receipt
Fall Protection	All Operations	29 CFR 1926.500	Protection for working over 6' above lower working surface.	Precautionary	Project Manager Superintendent Employee	Fall Protection Program	SSHP Receipt
Environmental Compliance (Federal)	All Operations	CFR Title 40: Protection of Environment	U.S. Environmental Protection Agency Protection of Environment	As Required	Safety Director Project Manager	Gallant Builders EMS	As per Gallant Builders EMS
Client SH&E Compliance	Client Specific	As specified by client	Follow individual client safety and environmental requirements	Continuous	All Employees	SSHP Inspections	SSHP Inspections
Vehicle Operation Compliance	All Operations	Federal, state and community driving laws and regulations	Follow all provincial and local vehicle operating laws and regulations	Continuous	Safety Director Project Manager	Training License Verification	Safety Department Human Resources

3.5 Written Safety and Health Goals, Objectives and Programs

OBJECTIVES

- To establish and maintain proactive documented safety and health objectives within Gallant Builders;
- To have objectives consistent with our safety policy and our commitment to continual improvement.

RESPONSIBILITIES

SAFETY DIRECTOR

- Develops the safety and health objectives for Gallant Builders on an annual basis.
- Occupational health and safety objectives and targets

PROJECT MANAGERS AND

SUPERINTENDENTS

train employees on objectives.

EMPLOYEES

Provide input into objectives planning through involvement.

3.5.1 Safety and Health Goals

The Safety Director identifies goals by:

- Aligning objectives with Gallant Builders policy, legal and other requirements, hazard abatement procedures
- Making objectives specific, measurable and achievable
- Gathering input from employees and interested parties
- Incorporating Management Review procedure

results
Examples of goals include:

- Reduction of risk levels
- Elimination or reduction in frequency of undesired incidents
- Implementing additional features of the Gallant Builders Safety & Health Management System

After goals are identified the Safety Director prioritizes them and establishes a scope, objective, time scale, and target, responsibilities and resources requirements for each identified objective and provides a safety management program.

Performance against developed goals is measured by and communicated to employees in memos, safety meetings and other as-needed methods. Developed goals are reviewed and modified on a quarterly basis. If circumstances have changed since the original formation of goals adjustments may be made and documented.

Progress on achieving goals is reviewed as part of the Key Performance Indicator procedure and Management Review procedure.

3.5.2 Objectives and SafetyPrograms

To establish and maintain management programs to achieve identified safety and health goals.

RESPONSIBILITIES

Safety Director

- Develops, documents and communicates the safety and health management programs to achieve identified safety and health objectives;
- Monitors progress towards objectives;
- Updates and revises safety and health management programs accordingly.

Project Managers and Superintendents

Implement safety management programs.

EMPLOYEES

Follow requirements of safety and health management programs.

PROCEDURE

The Safety Director establishes safety and health management programs based on objectives and responsible parties are notified of their requirements.

Where significant modifications in working practices, processes or equipment are expected the management program will provide for new hazard identification and risk assessments.

Progress for safety and health management programs is reviewed as part of the Key Performance Indicator procedure and Management Review procedure and shall be evaluated quarterly.

3.5.3 Written Annual Goals for 2016

SCOPE	PROGRAM OBJECTIVE	TARGET & TIME SCALE	RESPONSIBLE PARTIES	RESOURCES
All Operations	Training Compliance	100% Training Compliance by 12/31/16	Partner Safety Director	Time and Training
All Operations	SHMS Implementation	Implement SHMS Documentation by 12/31/16	Partner Safety Director	Time and Administrative

4.0 IMPLEMENTATION & OPERATION

OBJECTIVES

- To define and communicate roles, responsibilities, and authorities necessary to establish, implement, and maintain the SHMS
- To communicate the safety and health policy, objectives and targets, and other elements of the SHMS to employees and contractors
- To ensure employees are appropriately trained
- To establish procedures to handle safety and health inquiries from interested parties
- To identify and describe the core elements of the SHMS
- To control safety and health documents and procedures
- To maintain documented procedures to control operations that could impact safety and health
- To have an effective emergency preparedness and response plan

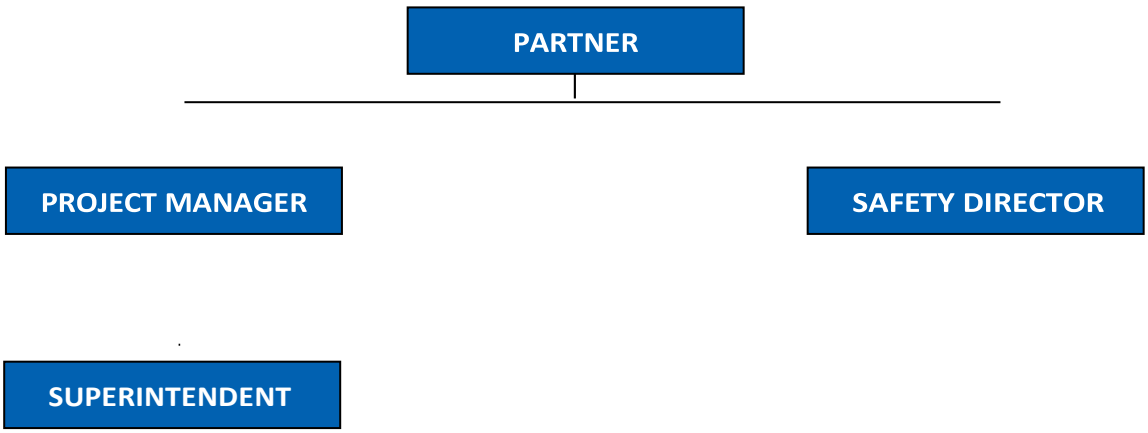
RESPONSIBILITIES

All responsibilities are identified within each of the Implementation and Operation procedures.

4.1 Overview

- Through effective implementation and operational controls Gallant Builders benefits by:
- Providing a framework for a systematic and integrated approach for safety and health management which allows the SHMS to become part of the fabric of our business
- Making the SHMS "system" dependent and not "person" dependent
- Promoting sound safety and health management which becomes a means of doing business and not an end in and of itself
- Positioning Gallant Builders as a safety and health leader.

4.2 Structure and Assignment of Responsibilities



OBJECTIVES

- To define roles, responsibilities and authorities are documented and communicated;
- To ensure adequate resources are provided to enable safety and health tasks to be performed.

RESPONSIBILITIES

Partner

Ultimate authority and responsibility for the SHMS lies with the Partners. The Partners ensure that adequate resources are available to accomplish the goals of the Gallant Builders SHMS and that the system is incorporated in the day-to-day conductof business.

Safety Director

The Safety Director is responsible for ensuring development, implementation and maintenance of the safety and health management system within Gallant Builders operations. This position reports to the Gallant Builders President for responsibility of performance. Responsibilities include, but are not limited to:

- Sets an example for employees to follow by incorporating safe work practices in all aspects of their activities and following all Gallant Builders and client safety policies and procedures
- Conducts incident analysis to identify incidenttrends
- Ensures that investigations are conducted and conducting site inspections
- Acts as a liaison between management and outside agencies
- Assures training programs are established and tracked for employees and supervisors
- Develops technical guidance and programs to identify worksite hazards
- Ensures corporate compliance with legal and other requirements.
- Monitors health and safety, environment and quality assurance policies, procedures, protocols and legal requirements and assists site management in implementation
- Liaison with client's Health and Safety Department, governmental agencies (i.e. OSHA, EPA, etc.).
- Ensures due diligence records are maintained incl. audits are conducted
- Monitors and address all program shortcomings
- Performsallriskmanagementrequirementsincludingworkerscompensationproceduresare followed
- Prepares reports including key performance indicators to management and to the client as needed
- Monitors corrective actions determined from audits, inspections, etc.
- Central point of contact for units in regards safety concerns

Operations Management Members (Project Managers and Superintendents)

These positions reports to the Gallant Builders President.

- Setting an example for employees to follow by incorporating safe work practices in all aspects of their activities and following all Gallant Builders and client safety policies and procedures;

- Investigating (or assisting in) incidents;
- Enforcing all Gallant Builders and client safety rules, policies or procedures in a consistent manner;
- Ensuring weekly safety meetings are conducted and documented;
- Incorporating safety performance in the personnel evaluation/appraisal process;
- Assuring that adequate resources are available to incorporate safety into their operations;
- Monitoring and ensuring those supervisors within their responsible area are performing their duties in accordance with this safety management system.

Supervisors/Foreman

Supervisors report to the operations management.

- Setting an example for employees to follow by incorporating safe work practices in all aspects of their activities and following all Gallant Builders and client safety policies and procedures;
- Enforcing all Gallant Builders and client safety rules, policies or procedures in a consistent manner;
- Assuring that safety devices and PPE are available and properly utilized;
- Promptly addressing safety concerns and issues brought to their attention by employees;
- Assuring that injuries/illnesses are treated promptly and management being notified immediately;
- Assisting in investigating all incidents and near misses;
- Assuring that no unsafe condition exists in their area of responsibility;
- Assuring that employees are properly oriented and trained for hazards and equipment at their location;
- Performing safety orientations and documenting the orientation before allowing any employee to begin work at their location.

All Employees

Working safely is a condition of employment. Each employee has personal responsibility and accountability for safety on the job. All employees are responsible for:

- Following all Gallant Builders and client safety policies and procedures and to perform assigned work duties in a safe manner;
- Stopping work immediately if they consider conditions or work methods to be unsafe and notifying their supervisor of the problem;
- Immediately reporting any injury, suspected injury, job related illness, spill or damage to any property to their immediate supervisor. If their immediate supervisor is not available the employee is then to immediately notify the project manager.

PROCEDURE

4.2.1 Documentation and Communication

Responsibilities are defined and documented within the Responsibilities section of each SHMS procedure. The responsibilities are clearly communicated to employees through various means such as job descriptions, meetings, site specific SH&E plans, training, SHMS Manual, etc. SHMS responsibilities are reviewed and revised through inspections, assessments, and management reviews.

4.3 Training, Awareness and Competency

OBJECTIVES

- To ensure the competence of personnel to carry out their designated function.
- A competent employee means adequately qualified suitably trained and with sufficient experience to safely perform work without supervision or with only a minimal degree of supervision.

RESPONSIBILITIES

Safety Director

Identifies updates and monitors training for employees.

Project Managers and Superintendents

- Shall ensure all employees assigned to their project complete training identified in the training matrix.
- Shall ensure that any work that may endanger an employee must be completed by an employee who is competent to do the work.
- Shall ensure all employees assigned to their project are trained in procedures until they are competent.
- Shall ensure all employees have sufficient experience to safely perform work without supervision or with only a minimal degree of supervision.

Employees

Attend and follow requirements of safety and health management training.

PROCEDURE

4.3.1 SH&E Competency Assurance Process

Competence is a combination of knowledge, understanding and skill, and the appropriate level of competence cannot be acquired simply by attending a training session. The understanding and skill are acquired by experience. For individuals managing SH&E hazards and risks experience and training are essential. The following components are to be considered for each worksite's delivery team for competency assurance:

Experience Level of Knowledge Capability to Perform

At Gallant Builders our view of competency assurance involves the continuous assessment of training and development needs against a person's responsibilities, abilities and critical activities. Not only will employees gather evidence of competence, they will also participate in an annual appraisal to assess their performance, behaviors and personal development. This process enables the continuous improvement loop that feeds back into training and development activities that ensure competency assurance is an ongoing career cycle process.

1. Job Description Identified → Candidate Selection and Hiring Process (Reference and Background Check, Drug Screen, Physical Assessment) → Person Assessed and Hired for Open Position

2. Experience, Qualifications Assessed for Initial Training ↔ Initial Induction Training Completion
3. Further Training Required? If no → Ready for Work → On the Job Training → Competency Continually Assessed
4. Annual Performance Appraisal → Ready to Promote? → Employee Promoted → Further Training Required?

Additional competency regarding health and safety is demonstrated during inspections employees are interviewed for knowledge to determine competency to work safely and be knowledgeable of their responsibilities within the Gallant Builders Safety and Health Management System.

For individual directly managing risk the specific requirements will be matrixed with training for areas such as legislative requirements, client SH&E requirements and recognized certification and licensing.

4.3.2 Identification of Training and Competency Needs

Training is identified in our training matrix which specifies safety and health training needs by job title. Our training matrix is updated based on changing risks.

4.3.3 Training Records

All training records are maintained on site either by the Safety Director or senior representative of management or their designee.

4.3.4 Delivery of Induction, Transfer & Refresher Training

Employees receive initial induction training. No work by any employee is allowed to begin until the safety orientation is completed.

Training requirements are tracked by the Safety Director and formal training sessions are conducted either on or off site by the Safety Director or competent/qualified instructor for the required subject matter.

4.3.5 Training Documentation

All training must be documented with: date; employee name, employee signature; instructor name; instructor signature and title of course.

Each new employee shall receive an orientation prior to beginning any work.

4.3.6 Supervisor Safety Management Training

Supervisors and managers receive annual, documented safety management system training.

4.3.7 Gallant Builders TrainingMatrix

Additional training for identified hazards must be completed prior to employee exposure based upon a hazard assessment. Sample shown.	LOCATION	FREQUENCY	Superintendent	Executive Management Project Manager	Craft
Bloodborne Pathogens	All	P2	P2	P2	PRN
Confined Spaces in Construction	All	I	I	I – PRN	X
Electrical Safety - Unqualified	All	I	I	I	I
EmergencyActionandResponse Plan	All	I	I	I	I
Fall Protection	All	I	I	I	I
Fire Protection and Fire Safety	All	A	A	A	A
First Aid/CPR	PRN	P2	P2	P2	PRN
Electrical Safety - Unqualified	All	I	I	I	I
Hand and Power Tools	All	I	I	I - PRN	I
Hazard Communication Program andGHS	All	A	A	A	A
Hearing Conservation	All	I	I	I - PRN	PRN
Isolation of Energy | LOTO	All	I	I	I - PRN	X
Job Hazard Analysis (JHA)	All	I	I	I	I
Ladder and Stairs	All	A	A	A	A
Personal Protective Equipment	All	A	A	A	A
Rigging Awareness	All	I	I	I - PRN	X
Scaffolding	All	I	I	I - PRN	PRN
Site Specific SH&E Plan	All	I	A	A	A
Supervisor Safety Training	All	I	I	I - PRN	PRN
Welding, Cutting and Brazing	All	I	I	I - PRN	PRN

PRN = As Required Frequency: I = Initial A = Annual Periodic 2 years = P2

4.3.8 Short Service Employee Program

The purpose of the Short Service Employee (SSE) Management program is to prevent work related injuries and illnesses to new hires and temporary workers. The Supervisors and co-workers must be able to readily identify Short

Service Employee participants. Gallant Builders will assign experienced employees to oversee the daily activities of those assigned to the SSE program. Refer to the Gallant Builders Short Service Employee Procedure.

Short Service Employee – An employee or sub-contractor employee with less than six months experience in the same job or with his/her present employer.

Supervisors will assure that all new, transferred and temporary employees have been through Gallant Builders Safety Orientation and have a complete knowledge of the expectations for their job function.

Short Service Employee participants will wear orange hard hats or another approved method of identification.

The Gallant Builders shall comply with client designated hardhat color for SSE.

Mentors will set the proper safety example for any Short Service Employee assigned them.

Mentors will be assigned one short service employee. Exception: in shop environments, a maximum of 3 Short Service Employee, participants may be assigned per mentor.

Short Service employees on client locations shall make up no more than 50% of a crew.

4.4 Consultation and Communication

OBJECTIVES

To encourage participation in good safety and health practices and support for our policy and objectives by consulting and communicating with all employees.

RESPONSIBILITIES

Safety Director

- Establishes procedure to ensure that pertinent safety and health information is communicated to and from employees and other interested parties
- Ensures employees are involved in the development and review of procedures to manage risks

Project Managers and Superintendents

- Encourages all employees to participate in safety matters and provide input into the safety process
- Immediately forwards any question, concern or suggestion any employee has regarding safety and health

Employees

- Provide input into the safety process and participate in all levels of safety they choose to

PROCEDURE

Methods used to involve employees in hazard identification, risk assessment and risk control and to encourage employee involvement in the safety and health process include:

4.4.1 Open Door Policy

It is preferred that the immediate supervisor and/or project management be consulted for resolution of the concern; however, Gallant Builders maintains a strong open door policy to report problems or concerns to any level of management without fear of reprisal of any employee

4.4.2 Behavior Based Safety Program (BBS)

- Employees may report any suggestions, unsafe act, unsafe condition or recognition, even anonymously, via the Gallant Builders BBS Safety Observation Form. The name of the employee being observed is never used. The form is to be immediately forwarded to the Safety Director. Refer to the Gallant Builders Behavior Based Safety (BBS) Procedure.
- Employees may use other observation forms if another safety observation program is present. Observations by fellow employees are to be performed in a positive, non-judgmental manner and the observing employee must give permission prior to the observation.
- No disciplinary action may result from safety observations by fellow employees. Supervisors will always allow time for safety observations to be made based on operational scheduling. Supervisors do not conduct observations.

4.4.3 Incident Alert Form

This communicates lessons learned from incidents, is posted on employee bulletin boards and shall be discussed in weekly safety meetings.

4.4.4 Weekly Safety Meetings

Employees are required to attend safety meetings and the meetings shall be documented. Management is to attend all safety meetings if present on site.

4.5 Document and Data

Control OBJECTIVES

To document and maintain up-to-date sufficient documentation to ensure that our health and safety management system is adequately understood and effectively and efficiently operated.

RESPONSIBILITIES

Safety Director (Preparation and Custodian Duties)

- Responsible for validating and approving all documents and revisions to existing documents
- Responsible for assuring documents included in an SHMS are in the proper format
- Ensures documents can be located, current versions are available, and obsolete documents are removed and determine the routing path for review of a controlled document
- Updates Gallant Builders SHMS Document Control List

PROCEDURE

The authority initiates document development. The authority seeks input from appropriate personnel to create the document. The draft document is submitted to the appropriate individuals for review.

4.5.1 Document Format

SHMS documents shall be consistent in format and include a document number, issue date, authority, approval and preparer revision history.

4.5.2 Reviewing

Reviews of controlled documents are performed annually. Revisions to controlled documents are performed on an as needed basis.

4.5.3 Control

The Safety Director prepares a Document Control List. The list defines the document retention period and other requirements.

4.5.4 Document Distribution

This manual is maintained on the Gallant Builders server and is available to the following personnel:
Partner

Operational Management

Project Manager

Human Resources

Superintendent

Safety Department

Clients upon

request

Only PDF versions of this manual are available to non-authorized persons. The master documents are maintained under a secure access configuration. No uncontrolled copies will be issued and only PDF documents will be distributed within the organization.

SHMS DOCUMENT CONTROL LIST

Document Title	On Site	Retention Off Site	Driver	Method	Authority	Date Last
SAFETY & HEALTH MANAGEMENT SYSTEM						
Safety & Health Management System	As Updated	5 Years	Policy	Electronic	Partner	**INSERT**
Worksite Hazard Assessment Form	As Updated	5 Years	Policy	Electronic	Partner	**INSERT**
Job Hazard Analysis (JHA)	As Updated	5 Years	Policy	Electronic	Partner	**INSERT**
Field Level Risk Assessment (FLRA)	As Updated	5 Years	Policy	Electronic	Partner	**INSERT**
Safety Observation Form	As Updated	5 Years	Policy	Electronic	Partner	**INSERT**
Incident Alert Form	As Updated	5 Years	Policy	Electronic	Partner	**INSERT**
Field Incident Report Form	As Updated	5 Years	Policy	Electronic	Partner	**INSERT**
Bloodborne Pathogens	As Updated	5 Years	Policy	Electronic	Partner	**INSERT**
Disciplinary Program	As Updated	5 Years	Policy	Electronic	Partner	**INSERT**
Confined Spaces in Construction	As Updated	5 Years	Policy	Electronic	Partner	**INSERT**
Electrical Safety	As Updated	5 Years	Policy	Electronic	Partner	**INSERT**
Fall Protection	As Updated	5 Years	Policy	Electronic	Partner	**INSERT**
Fire Safety and Prevention	As Updated	5 Years	Policy	Electronic	Partner	**INSERT**
Fire Safety - Extinguishers	As Updated	5 Years	Policy	Electronic	Partner	**INSERT**
Hand & Power Tools	As Updated	5 Years	Policy	Electronic	Partner	**INSERT**
Hazard Communication (HAZCOM)	As Updated	5 Years	Policy	Electronic	Partner	**INSERT**
Ladder Safety Program	As Updated	5 Years	Policy	Electronic	Partner	**INSERT**

		Retention				
Document Title	**On Site**	**Off Site**	**Driver**	**Method**	**Authority**	**Date Last**
Managing Hazardous Energy	As Updated	5 Years	Policy	Electronic	Partner	**INSERT**
Noise/Hearing Conservation	As Updated	5 Years	Policy	Electronic	Partner	**INSERT**
Personal Protective Equipment	As Updated	5 Years	Policy	Electronic	Partner	**INSERT**
Rigging	As Updated	5 Years	Policy	Electronic	Partner	**INSERT**
Ladder Safety Program	As Updated	5 Years	Policy	Electronic	Partner	**INSERT**

4.6 Operational Control

OBJECTIVES

To establish and maintain arrangements to ensure effective measures are used to control risk, to follow our safety and health policy, meet objectives and conform to legal and other requirements.

Refer to specific Gallant Builders safety program document external to this document.

RESPONSIBILITIES

Safety Director

Responsible for development of operational controls and reviewing to confirm the appropriate legal and other requirement are identified in the operational controls.

Project Managers and Superintendents

- Responsible for the implementation of operational controls at the operational level of the SHMS
- Identifies the roles and responsibilities of operations personnel

Employees

- Follow all safety and health procedures
- Provide suggestions and other input to improve procedures

PROCEDURE

4.6.1 Compliance with Legal and Other Requirements

Gallant Operations, with assistance from the Safety Director, leads the development, documentation, and maintenance of applicable operational controls. Operational controls are developed for safety and health requirements identified in the Safety and Health Compliance Matrix.

4.6.2 Identified Hazards and Risks

Operations and activities associated with hazards and identified risks are addressed within the SHMS through the worksite hazard assessment.

4.6.3 Management of Change (MOC)

Operations identifies facility and operational changes for review. The Safety Director determines whether the changes have a potential impact the operational controls and, if so, updates the operational controls in conjunction with Operations. Modifications and revisions to operational controls are communicated to relevant personnel via the site specific SH&E plan.

4.6.4 Purchase of Goods and Services

- Only approved suppliers are used when purchasing personal protective equipment to ensure the equipment meets regulatory requirements.

- No hazardous chemical may be purchased without proper SDS documentation.

4.6.5 Systems to Control Access or Exiting Customer's Premises

- All vehicles will be properly insured and equipped with all client vehicle required safety equipment.
- All staff will have proper client required training and identification prior to entering a client location.
- All staff will log in and log out per client requirements.
- No material will be brought onto or leave client property without permission from the client in accordance with their requirements.

4.6.6 Background Checks Prior to Issuing Identification Cards

- All individuals shall provide proof of identity prior to being issued a badge or access to Gallant Builders or client property. The proof must be issued by a governmental agency and have a photo (driver's license, passport, etc.).
- All visitors shall log in and out of our or client facilities.
- Further background investigation may be required based on the sensitivity of the employee's position.

4.6.7 Gallant Builders Employee Identification System (As Required)

- All employees shall be issued an identification badge with photo included.

4.6.8 Hazardous Materials

- No controlled products or materials will be allowed to be used unless there is a valid Safety Data Sheet (SDS) available on-site and there is a supplier or workplace label on the container for any controlled product that is produced, manufactured or used at any work site.
- Gallant Builders will ensure the SDS is obtained from the supplier when receiving a controlled product on each job site.
- Gallant Builders will ensure that SDS are filed at the work site where they will be readily accessible to employees. SDS must be updated every three years.
- Gallant Builders will ensure that SDS are available and posted near the work site where controlled products are used.
- Superintendents will ensure that employees are notified if a controlled product is to be used in an open area or where fumes may migrate.
- A Chemical Inventory List and Safety Data Sheets shall be kept at a main location and will be made available to employees for review.
- Any work site generated waste classified as hazardous shall be stored and handled safely and properly using a combination of any and all means of identification and instruction of employees on the safe handling of the hazardous waste.

4.6.8 Control of Hazardous Materials for Client Locations

- No hazardous material will be brought onto client property unless all client approval processes have been met. This may involve a needs analysis review and SDS submittal and approval. All client procedures must be followed.

4.6.10 Reporting of Hazardous Conditions, Security Incidents or Injuries

- All employees have a responsibility for reporting hazardous work conditions or acts that are encountered on the job site.
- Employees shall not perform any work they feel is unsafe. Each employee is required to immediately report any unsafe condition or act to their immediate supervisor. Any employee may report hazardous work conditions without fear ofreprisal.
- Employees shall immediately report any injury, near miss and incidence of fire, property damage, theft or other security related matter and environmental non-conformance or, before reporting for work, and any non-work injuries or prescriptions that could affect their ability to safely perform their normal job.
- Failure to report incidents, hazardous work conditions or near misses shall result in disciplinary action.
- Additional methods for reporting hazardous conditions include: Weekly safety meetings; Gallant Builders BBS Safety Observation Form to the Safety Director/ Supervisor
- Direct communications with any member of Gallant Builders supervision or management;
- Client hazard reporting methods.

4.6.11 Fire Fighting - Incipient Policy

Employees shall only use fire extinguishers if trained. No employee will risk their own or others personal safety in attempting to put out a fire in its initial (incipient) stage. Employees will evacuate and use the appropriate alarm and allow qualified individuals attempt to extinguish the fire.

4.6.12 Disciplinary System

Management is committed to the safety excellence of its employees by providing an injury and incident free workplace. All employees are to abide by the regulations, safety rules and the use of safe work practices and procedures. Refer to the Gallant Builders Disciplinary Action Procedure.

Safety violations will be handled in an objective but firm manner. The enforcement progression follows the steps outlined below with documentation at each stage:

- Verbal Warning
- Written Warning
- Dismissal

Violation of any of the below rules will not be tolerated on the job and are additional grounds for immediate discipline up to and including dismissal:

- Consuming or being in possession of alcohol or illegal drugs on Gallant Builders premises, or on any Gallant Builders job-site, is prohibited.
- No weapons or firearms of any type are allowed on the worksite.
- Fighting, horseplay, practical jokes or otherwise interfering with other workers is prohibited.
- Theft, vandalism or any other abuse or misuse of any job site or clients property is prohibited.
- All unsafe acts and conditions, including “near miss” incidents, are to be reported to appropriate
  supervision promptly.
- Hard hats, work boots and safety glasses are to be worn at all times on all job-sites.

- All work shall be carried out in accordance with appropriate safe work practices and your supervisor's direction.
- Only those tools that are in good repair, with all guards and safety devices in place, shall be used.
- Attempted or actual physical force to cause injury, threatening statements or other actions to cause an employee to feel they are at risk of injury.

4.6.13 Impairment

Gallant Builders has a ZERO tolerance and prohibits any employee from possessing or being under the influence from alcohol, drugs and other substances at any Gallant Builders work location. Refer to the Gallant Builders Drug and Alcohol Policy Statement.

4.6.14 General Safety Standards and Guidelines

The below applies to all Gallant Builders worksites. Additional work practices are contained in the site specific SH&E plans based on local operating requirements as well as specific Gallant Builders safety programs associated with this safety and health management system.

Training

- All work that may endanger an employee must be completed by an employee who is or is working under the supervision of an employee who is competent to do the work. All employees must be trained until they are competent.

Housekeeping

- Gallant Builders is responsible for making sure that the work site, and in particular entry and exit routes at a work site, are free of waste, materials and equipment.
- Obstructed entry and exit routes can pose a serious hazard to workers having to leave a work site quickly, as might be required during an emergency and shall be kept clear at all times.
- Obstructions may reduce visibility at a work site and may also present a tripping hazard and shall be removed as observed.

Lighting

- The site Electrical subcontractor is responsible for ensuring adequate lighting is available for tasks requiring the ability to distinguish detail, such as an electrician working on live circuits at a panel board or a sewing machine operator stitching a product.
- The site Electrical subcontractor is responsible for protecting light sources above a working or walking surface against damage.
- Emergency lighting must be available if employees are in danger if the normal lighting system fails. Natural daytime lighting cannot be relied upon as a dependable source of emergency lighting.
- Gallant Builders is responsible for ensuring that an emergency lighting system provides sufficient light to allow workers to safely leave the work site, start any necessary emergency shutdown procedures or restore normal lighting.

Pallets and Storage Racks

- All goods, materials and equipment at work sites must be stacked, stored, and secured in such a way that they do not flow, move, roll or collapse. Employees responsible for stacking, storing, or securing goods, materials, and equipment must be trained in the safe methods for doing so.
- Stacks, shelving and other fixtures for holding or storing materials shall be laid out and designed so that there is sufficient access for safe loading and unloading.
- Storage areas shall be specifically designated and be clearly marked. Aisles should be wide enough for the type of storage, and be kept free of obstacles and waste materials.
- Suitable racks will be provided for materials capable of rolling such as steel tubes, bars and piping. Large diameter tubes or pipes can be stored on their sides as drums might be stored.
- Wedges, chocks, stakes or other means shall be used to restrain the bottom tier of round objects that are stacked or tiered and that could cause the stack to collapse by rolling or moving.
- Racks, shelving, fixtures, etc. shall be regularly inspected for damage and other defects that might cause loss of strength or result in injury or damage.
- Employees must report to their employer any damage to storage racks as soon as is practical.

Restraining Hoses and Piping

- In those cases where failure or disconnection could cause movement that endangers employees, the hoses or piping and their connections must be restrained.
- Methods of restraint include wiring together hose connections, clamping or bracketing pipe sections, and securing restraint cables at the ends of hoses or pipe that function as loading spouts.

Securing Equipment and materials

- Bags, containers, bundles, etc. stored in tiers must be stacked, blocked, interlocked and limited in height to prevent sliding or collapse.
- Loads must be secured by tie-downs, bulkheads, or blocking. Rolling equipment, when parked, shall have wheels chocked to prevent unintentional movement.

Vehicle Traffic Control

- Employees on foot and exposed to the hazards of moving vehicles are required to wear highly visible apparel that is clearly distinguishable.

Apparel

- Apparel should be kept clean and worn as intended – done up properly around the body with no loose or dangling parts, there is to be no wearing of jewelry while working on site to ensure no entanglement and no other clothing or equipment shall obscure high visibility clothing.

4.6.15 Site Equipment and Working Conditions

- Damaged and faulty equipment reporting procedures must be in place.
- No Gallant Builders employee is allowed service vehicle tires or wheel assemblies. This work shall only be performed by a qualified contractor.
- No equipment shall be operated unless the employee has received proper training by the supervisor.

- Tools and equipment damaged during use must be replaced or repaired only by a qualified person or Gallant Builders.
- Floors, platforms, ramps, stairs and all walking surfaces for employees must be maintained in a state of safe repair and kept free of slipping and tripping hazards. If such areas are taken out of service Gallant Builders will take reasonable means for preventing entry or use.
- Gallant Builders shall ensure that worksite traffic is controlled to protect our employees. This will be accomplished through engineering controls or administrative controls either by Gallant Builders or via our customers if they maintain control of the traffic on the worksite. Each worksite must have a designated safe way of entering and exiting.
- Gallant Builders will ensure that housekeeping issues such as keeping the work site clean and free from materials or equipment that could cause employees to slip or trip.
- Gallant Builders will ensure all equipment is maintained, safe to perform adequate strength for its purpose and free from obvious defects. As with our statement that if it isn't safe doesn't do it – this also applies to equipment; if it isn't safe don't use it.
- Any equipment being found to be defective or in need of repair shall be tagged out, isolated from service by being turned into an employee's direct supervisor and not used until repaired by a qualified repair person.

4.6.16 Lone Workers Policy

Each worksite shall develop a Working Alone Plan and must provide effective radio, telephone, cellular phone or other electronic communication between an employee who works alone and persons capable of assisting the worked in an emergency or if the employee is injured or ill.

Each worksite's Working Alone Plan shall address having an established contact person. A person must be designated to establish contact with the employee at predetermined intervals and the results must be recorded by the person.

If electronic communication is not practicable or readily available at the worksite, Gallant Builders must ensure that a representative of Gallant Builders or another competent employee visits the employee, or the employee contacts Gallant Builders or another competent employee.

These visits or contacts shall be at intervals of time appropriate to the nature of the hazards associated with the employee's work. As a minimum contact shall occur no less than every four hours.

The hazard assessment and Working Alone Plan at each Gallant Builders worksite must be reviewed on an annual basis or when work processes or arrangements which could affect an employee's well-being are introduced or changed.

4.6.17 Lifting and Handling Loads

- No employee will manually lift, lower, push, pull, carry, handle or transports a load that could injure them.
- Gallant Builders has a responsibility to provide, where reasonably practicable, appropriate equipment for lifting, lowering, pushing, pulling, carrying, handling or transporting heavy or awkward loads.

- Within each worksite's site specific safety plan is a hazard assessment that all employees receive. Included within that document that all employees receive and are tested on is an area addressing how to handle heavy and awkward loads to minimize manual handling by the employee. Examples include: not lifting over a set amount, being required to ask for help, being required to utilize mechanical means for lifting and transport, etc.
- Material and equipment must be placed, stacked or stored in a stable and secure manner. Stacked material or containers must be stabilized as necessary by interlocking, strapping or other effective means of restraint to protect the safety of employees.
- An area in which material may be dropped, dumped or spilled must be guarded to prevent inadvertent entry by employees, or protected by adequate covers and guarding.

4.6.18 Driving Safety

Operators of Gallant Builders or client on or off road vehicles shall be qualified by possession of a valid, current driver's license for the type of vehicle being driven.

No passengers shall be on trucks used to deliver goods.

Drivers shall have 3 years of driving experience on the vehicle he/she is licensed to drive & regularly drives.

Passenger compartments are to be free from loose objects that might endanger passengers in the event of an incident. Any vehicle with non-segregated storage shall be equipped with a cargo net or equivalent to separate the storage area.

Vehicles (light vehicles, heavy vehicles and trailers) may not be modified without the endorsement of the manufacturer.

Signs, stickers or labels are to be fitted in such a manner that they do not obstruct the driver's vision or impede the driver's use of any controls.

Gallant Builders requires drivers and all passengers to wear seat belts anytime the vehicle is in motion. All Gallant Builders vehicles capable of more than 10 mph shall have seat belts installed and they shall be used.

<u>Employees driving vehicles are required to:</u>

- Obey all local and provincial driving laws or regulations as well as requirements of clients;
- Immediately report any citation, warning, vehicle damage or near miss associated with Gallant Builders or client vehicle operation to the supervisor;
- Immediately report any restriction or change to their driving privileges to the supervisor.
- Seat belts shall always be worn by all occupants during the operation of any vehicle; only seats fitted with three-point inertia-reel type seatbelts be used. All vehicles capable of more than 10 mph shall have seat belts installed.
- Defensive drivers continually assess conditions and hazards and remain prepared for any challenge that may approach them;
- When speaking with a passenger, always keep your eyes on the road;
- Both hands on the wheel;

- Our policy prohibits backing whenever practicable. Where backing is required, drivers, when parking, should make every effort to park the vehicle in a manner that allows the first move when leaving the parking space to be forward. The vehicle must either have a reversing alarm, or the driver shall use a spotter or walk around the truck/trailer prior to backing;
- No use of cell phones, radios or other electronic devices while driving any vehicle - vehicle must be safely parked prior to using a mobile phone or 2-way radio;
- Slow down around construction, large vehicles, wildlife, fog, rain, snow, or anything else that adds a hazard to your driving;
- Drive for conditions, not just the speed limit;
- Alcohol or illegal drugs are not allowed to be in a Gallant Builders, client or leased vehicle at any time and all vehicles are subject to random inspections.

Drivers are to be prepared before leaving:

- Perform 360 walk around – report new damage;
- Check windshield for cracks that could interfere with vision;
- Inspect for vehicle damage and immediately report any damage to the supervisor if not previously observed;
- Make sure dirt or snow is removed from lights on all sides of the vehicle;
- Brush or clean off snow or ice on all windows to ensure complete vision;
- Check fuel level to be certain the destination can be reached;
- Check to ensure the license plates and inspection tag on vehicle are current;
- Ensure that there is a first aid kit and inspected fire extinguisher in the Gallant Builders vehicle;
- Ensure driver is rested and alert for driving;
- Secure all loads;
- Employees are not to perform repairs or maintenance other than routine fluid additions unless qualified.
- Assess the risk of a journey before driving and plan their driving route based on a journey risk assessment.

4.6.19 PPE

- The use and care of personal protective equipment is the responsibility of the employee. Gallant Builders provides its employees basic safety equipment such as safety glasses, hard hats; gloves and other as-required PPE.
- Subcontractors are required to provide their employees with the basic safety equipment such as safety glasses, hard hats, gloves and other as-required PPE
- PPE must be inspected by the employee for defects prior to each use. Where defective or damaged PPE is found during inspection, it must be disposed of properly. PPE must be kept clean and in good repair at all times.
- Gallant Builders may require that other companies with employees to work on our site. They shall have a comprehensive health and safety program and comply with Gallant Builders safety and environmental policies.

4.6.20 Preventative Maintenance Program for Tools and Equipment

All tools, equipment and vehicles must be properly maintained so that workers are not endangered. Preventive maintenance is the systematic care and protection of tools, equipment, machines and vehicles in order to keep them in a safe, usable condition limit downtime and extend productivity. Maintenance tasks themselves are potentially hazardous and can result in injury. This maintenance program must be prepared at a site level and:

- Be well organized and scheduled
- Controls hazards
- Defines operational procedures, and
- Trains key personnel

General requirements for equipment maintenance include:

- Obtaining a copy of the maintenance schedule recommended by the manufacturer.
- Ensuring that maintenance is performed as required.
- Ensuring that the person(s) performing the maintenance are competent (e.g. licensed mechanic).
- Retaining records of maintenance/service conducted.
- Specifying who is responsible for overseeing equipment maintenance and where the records are kept.
- Set up a system for removal and tagging of damaged or defective tools and equipment.

Tools and Equipment Maintenance Program

- Only properly trained workers are to use tools, equipment and vehicles.
- Inspect all tools, equipment and vehicles before using.
- For vehicles, inspection will consist of doing a circle check.
- If applicable, maintenance schedules for all tools, equipment and vehicles are to be respected.
- If at any time a worker judges that a tool, equipment or vehicle is unsafe for use, they are to properly tag the item and inform the supervisor immediately.
- Tools, equipment or vehicles that are tagged unsafe shall be either repaired or replaced - Gallant Builders management shall be informed.

REMINDERS: Always use Hand and Power Tools Safely

- Select the right tool for the job.
- Keep tools in good condition.
- Use tools the correct way.
- Keep tools in a safe place.

Maintenance Personnel Qualifications - All individuals who perform maintenance work on Gallant Builders tools shall have the appropriate skills, accreditation and/or certification. This certification applies both to Gallant Builders employees, subcontractors, rental companies and to contracted maintenance services.

Mobile Equipment Maintenance Program - Maintenance Personnel Qualifications - All individuals who perform maintenance work on Gallant Builders mobile equipment will have the appropriate skills, accreditation and/or certification. This certification applies both to Gallant Builders employees, subcontractors, rental companies and to contracted maintenance services.

Operator Qualifications and Training - All individuals who operate mobile equipment, cranes, vehicles etc. will have the appropriate skills, accreditation and/or certification. This applies to both Gallant Builders employees and contracted equipment services. The approval process includes the following:

- Possession of a valid certification appropriate to the type of equipment
- Possession of a valid driver's license appropriate to the type of equipment – if applicable.
- Successful completion of a practical operating exam administered by competent and authorized personnel
- DOT Vision test to meet the appropriate standard - Vision tests must be conducted by competent and authorized personnel
- DOT Hearing test with or without a hearing aid must be adequate for the specific operation. Hearing tests will be conducted by competent and authorized medical personnel.
- The operator shall be trained in the following:
    - Their responsibilities to operate the equipment in a safe manner
    - Familiarity and comprehension of safety requirements for the piece of mobile equipment which they intend to operate
    - Manufacturer's operating and maintenance procedures;
    - Hand signals and/or other requirements set by Gallant Builders.

Records - The maintenance program must contain a recording system. Part of this system should be made up of inventories and schedules. In addition, the recording system should document what maintenance work was done, when, and by whom.

Monitoring - The monitoring functions in a maintenance program fall into two areas. First, the staff responsible for operating and/or maintaining equipment must monitor that equipment to ensure that appropriate checks and maintenance are done. Secondly, management must monitor the entire program to ensure that it is functioning in accordance with the subcontractor's policy and manufacturers recommendations.

Scheduled Inspections and Maintenance - All mobile equipment is to be inspected and maintained according to the following Equipment Inspection Schedule as a minimum. Records of all inspections and maintenance are completed and maintained for review and approval.

Maintenance of equipment, release of lubrication fluids, etc., is performed only in approved areas. Spills and leaks from equipment are cleaned up promptly.

EQUIPMENT INSPECTION SCHEDULE

TYPE OF EQUIPMENT	TYPE OF INSPECTION	SCHEDULE
Cranes - Crawler, Truck, Hydraulic, etc.	Complete Inspection and Certification	Before put to work and annually
	Critical items, controls, overall functioning	Daily
	Safety device, hooks, cables, electrical	Monthly
	Complete inspection	Every 3 months
	Repair	When failure occurs
	Preventative maintenance	Manufacturer's recommendation
Heavy Equipment	Complete inspection	Before put to work
Dozers, Backhoes	Complete inspection	Every 3 months
Compactors, Trucks	Repair	When failure occurs
	Preventative maintenance	Manufacturer's recommendation
	Operator's checklist	Daily
Miscellaneous	Complete inspection	Before put to work
Compressors, Welding Machines, Generators	Complete inspection	Every 3 months
	Repair	When failure occurs
	Preventative maintenance	Manufacturer's recommendation
Slings, Shackles, Chokers, Lifting Devices	Deformation, cracks, corrosion, etc.	Daily or before each use
	Regular inspections of all devices	Every 3 months

Pre-Operation Checks

- Walk around checks on all pieces of mobile equipment are necessary to ensure the unit is safe to operate both from the personnel standpoint and for the equipment; that is, all fluids must be at the correct level and all components must be intact.
- Check for personnel in the cab area and around the equipment. Before the operator commences the pre-start checks, the operator should check the cab area for other operators and others who may be working around the equipment.
- Visual check - The operator should walk completely around the equipment looking underneath the equipment, in the engine compartment, and in the cab.
- Brake Lines - Visually check the brake lines for leaks. Check for moisture on the brake line. Report any leaks to maintenance for repair as soon as possible. DO NOT operate equipment with brake leaks.
- Steering Assembly - Check the tie rod ends, pins and keepers, drag links, ball joints, steering rams and hoses; Check that all the joints are tight; Report any faulty conditions to your supervisor.

- **Note: Never operate a truck with faulty steering.**

4.7 EMERGENCY

PREPAREDNESS

OBJECTIVES

RESPONSIBILITIES

Safety Director

- Develop, review and implement contingency response plans and procedures
- Ensure employees are aware of contingency plans through training
- Monitor effectiveness of contingency plans

Project Managers and Superintendents

- Responsible for ensuring necessary assets are made available for all contingency procedures
- The implementation of the contingency procedures or plans for their jobsite.

Employees

- Follow all contingency procedures or plans
- Through the Joint Health and Safety Committee reviewing and revising as required the emergency response plans.

4.7.1 Preparedness Requirements

Each Gallant Builders jobsite shall have contingency plans that identify the potential for incidents and emergency situations. Refer to the Gallant Builders Emergency Response Program.

These shall include, as a minimum:

- Plans for responding to an emergency that may require a need for rescue or evacuation is found.
- Plans to address thermal exposure of heat and cold
- Plans to address workplace violence
- Plans to address working alone
- Plans to address severe weather
- Plans to address medical emergencies
- Plans to address any other known or potential emergency

Each jobsite or facility shall conduct an annual routine emergency evacuation drill.

5.0 CHECKING & CORRECTIVEACTIONS

OBJECTIVES

- To identify Key Performance Iindicator's (KPIs) for safety and health performance
- To have effective procedures for reporting and evaluating/investigating incidents and non-conformance to requirements
- To establish and maintain procedures for the identification and maintenance of safety and health records
- To allow our Gallant Builders to review our own conformity to the Gallant Builders Safety and Health Management System by conductinginspections

RESPONSIBILITIES

All responsibilities are identified with each of the SHMS Checking and Corrective Actions procedures.

Through effective checking and corrective actions Gallant Builders benefits by:

- Measuring success and areas for improvement within the safety and health processes
- Learning from problems and making sure we follow our own procedures
- Maintaining clear and consistent documentation

5.1 Key Performance Indicator Measuring and

Monitoring OBJECTIVES

To identify key performance indicators for safety and health performance.

RESPONSIBILITIES

Safety Director

Reports to senior management monthly measured results of identified objectives and annual safety programs goals.

PROCEDURE

5.1.1 Health and Safety Key Performance Indicators (KPI)

KPIs are used to determine what changes need to be made, to review individual project management success towards compliance and to track progress towards published goals and objectives. KPI results are supplied to Gallant Builders management on a monthly basis. Safety and health KPIs are tracked for each project manager's responsible area and include:

- Injuries
- Days Away From Work Cases
- Restricted Work Cases; Recordable Medical Cases
- Total Recordable Injuries/Illness and IncidentRate

- First Aid Cases
- Near Miss Incidents
- Hours Worked
- Vehicle incidents and property damage or loss
- Reportable spills
- Workers compensation data

5.1.2 Monitoring

Monitoring is conducted to confirm and check compliance with safety and health requirements and to ensure the use and effectiveness of operational controls. Activities include:

- Annual Management Review
- Monthly Key Performance Reports
- As needed jobsite and facility inspections
- Employee observations
- Incident investigations

5.2 Incidents, Reporting, Non-Conformance and Corrective

Actions OBJECTIVES

To have effective procedures for reporting and evaluating/investigating incidents and non-conformances in order to prevent further occurrences.

RESPONSIBILITIES

Safety Director

Ensures investigations are conducted and assists in identifying corrective actions.

Project Managers and Superintendents

- Investigates (or assists in) incident and near miss investigations
- Corrects non-conformances
- Accompanies injured employees to the medical provider for initial treatment.
- All Incident investigations will be reviewed by senior management

Employees

Immediately report any injury, job related illness, spill, property damage or near miss to their immediate supervisor. If their immediate supervisor is not available the employee is then to immediately notify the project manager.

PROCEDURE

5.2.1 Reporting Policy

This policy shall be communicated so all employees understand our position. The following must be reported to the employee's supervisor immediately. If that person is not available then the Safety Director shall be immediately notified for:

- Near miss incidents with the potential to harm people, the environment or assets
- Work related injuries or illnesses; Property damage including vehicle incidents
- Hazardous chemical spillage, loss of containment and contamination
- Non-conformance to safety or environmental rules, policies or standards
- Fires, explosions, motor vehicle crashes, etc.
- Security concerns such as theft, suspicious activity, etc.

The supervisor makes the necessary notifications and begin the incident investigation process.

In the case of a major injury or incident the scene of the event should be closed off and kept "as is" at the time of the incident. This is vital for effective incident investigation.

An authorized individual shall accompany injured employees to the medical provider for initial treatment.

5.2.2 Investigations of Incidents & Non-conformances

Investigation is an important part of an effective safety program in that it determines the root cause and corrective actions necessary to prevent similar incidents or non-conformances.

Incident investigation occurs as soon as possible, while the facts are still fresh within the minds of those involved (i.e. witnesses). Take the opportunity to talk to all of those involved before they become unavailable or memory fades. An incident investigation must be thorough and concerned only with cause and prevention and must be separate from administrative disciplinary action.

5.2.3 Incident Reporting Matrix

The Incident Reporting Matrix identifies, based on type of incident, who within corporate management shall be verbally notified and when. It also specifies which type of report from the field shall be completed based on the type of incident.

INCIDENT NOTIFICATION MATRIX

TYPE OF INCIDENT	WHO TO NOTIFY VERBALLY	WHEN	INCIDENT REPORT
Minor First Aid	Safety Director	24 hours	Yes
Clinic or Doctor Visit	Safety Director	ASAP	Yes
Hospitalization/Amputation /Fatality	Partner then Safety Director	ASAP	Yes
Reportable Spill	Safety Director	ASAP	Yes
Property damage more than $500	Safety Director	ASAP	Yes
Non-conformance	Safety Director	24 hours	Verbally Initially

5.2.4 Incident Review Team and Incident Investigation Report

When deemed necessary, the Safety Director forms an Incident Review Team that participates in the determination of a final root cause investigative incident report. The team consists of representatives of management or other designees as assigned by the Safety Director.

The team will utilize a Root Cause Analysis (RCA) model of incident investigation. The final incident investigation report consists of findings with critical factors, evidence, corrective actions, responsible parties, and timelines for corrective action completion.

Results of incident investigations are communicated to employees via the Incident Notice form.

5.2.5 Field Incident Report Form

The Gallant Superintendent the Field Incident Report and takes the below steps when beginning an incident investigation.

- Provide emergency assistance, as needed and qualified for
- Secure the area as quickly as possible to retain area in the same condition at the time of the incident
- Notify management by phone according to the Incident Notification Matrix
- Identify potential witnesses
- Use investigation tools, as needed (camera, drawings, video, etc.)
- Tag out for evidence any equipment that was involved
- Interview witnesses (including the effected employee) and obtain written, signed statements and email to the Safety Director
- Prepare Gallant Builders Field Incident Report, sign the form, email it to the Safety Director
- Implement any immediate corrective actions needed;

5.2.6 Incident Alert Form

In order to communicate incident information and lessons learned from incidents the Safety Director shall send the Incident Notice to all work sites. The form shall be posted on employee bulletin boards and shall be discussed in weekly safety meetings until all employees at the job site have been informed of the incident.

5.2.7 Corrective Actions

Superintendents are held accountable for closing corrective actions. Corrective actions for safety improvement input are posted at each site and tracked by the Safety Director to ensure timely follow up and completion.

Corrective actions are also used as needed for revisions to site specific safety plans and the Gallant Builders Safety and Health Management System.

All incident investigations will be brought to closure.

5.2.8 Accompany Employees to Medical Treatment

Whenever possible an authorized individual shall accompany any injured employees to the medical provider

for initial treatment. This is to ensure the medial provider has all required information regarding the administration of workers compensation, availability of return to work job functions available and to ensure the employee receives the best possible medical attention.

5.2.9 Incident Classifications

Damage – Damage to personal, business or client owned property occurred. **Environmental** – Damage to the environment or animal interaction occurred. **Injury** – An injury to staff, contractor or client staff occurred.

Near Miss – An incident occurred that had the potential of becoming a higher level incident of actual injury, damage, etc.

Non-conformance – An incident occurred because a safety, environmental or quality rule, policy or procedure was not followed.

5.2.10 Injury Classifications

Injuries shall be classified per the following:

First Aid – Dressing on a minor cut, removal of a splinter, typically treatment for household type injuries.

Lost Work Day Case (LWDC) – An injury that results in an employee being unfit to perform any work on any day after the occurrence of an occupational injury.

Number of Lost or Restricted Work Days – The number of days, other than the day of occupational injury and the day of return, missed from scheduled work due to being unfit for work or medically restricted to the point that the essential functions of a position cannot be worked.

Occupational Injury – An injury which results from a work related activity.

Occupational Illness – Any abnormal condition or disorder caused by exposure to environmental factors while performing work that resulted in medical treatment by a physician for a skin disorder, respiratory condition, poisoning, hearing loss or other disease (frostbite, heatstroke, sunstroke, welding flash, diseases caused by parasites, etc.). Do not include minor treatments (first aid) for illnesses.

Recordable Medical Case (RMC) – An occupational injury more severe than first aid that requires advanced treatment (such as fractures, more than one stitch, prescription medication of more than one dose, unconsciousness, removal of foreign body embedded in eye (not flushing), admission to a hospital for more than observation purposes) and yet results in no lost work time beyond the day of injury.

Restricted Work Day Case (RWDC) – An occupational injury which results in a person being unfit for essential functions of the regular job on any day after the injury but where there is no time lost beyond the day of injury. An example would include an injured associate is kept at work but not performing within the essential functions of their regular job.

Work or Work Related Activity – All incidents that occur in work related activities during work hours, field visits, etc. are reportable and are to be included if the occupational injury or illness is more serious than requiring simple first aid. Incidents occurring during off hours and incidents while in transit to or from locations that are not considered an employee's primary work are not reportable.

The following are examples of incidents that will not be considered as recordable:

- The injury or illness involves signs or symptoms that surface at work but result solely from a non-work- related event or exposure that occurs outside the work environment.
- The injury or illness results solely from voluntary participation in a wellness program or in flu shot, exercise class, racquetball, or baseball.
- The injury or illness is solely the result of an employee eating, drinking, or preparing food or drink for personal consumption (whether bought on the employer's premises or brought in). The injury or illness is solely the result of an employee doing personal tasks (unrelated to their employment) at the establishment outside of the employee's assigned working hours.
- The illness is the common cold or flu (Note: contagious diseases such as tuberculosis, brucellosis, hepatitis A, or plague are considered work-related if the employee is infected at work).

5.2.11 Return to Work - Light/Restricted Duty Procedure

Objectives

It is the goal of Gallant Builders to return employees to meaningful, productive temporary employment following injury or illness until their health care provider releases them to full duty.

The return to work program provides opportunities for any employee who sustains a compensable injury during the course and scope of employment to safely return to work. If the employee is not capable of returning to full duty, the return to work program provides opportunities for the employee to perform a temporary assignment, either modified or alternative duty as defined below.

Definitions

Lost Time - Time spent away from work beyond the day of injury at the direction of the treating health care provider as a result of a compensable injury sustained in the course and scope of employment. The term does not include time worked in a temporary assignment.

Full Duty - Performance of all duties and tasks of the position for which the employee is employed. Full duty entails performing all essential and non-essential functions of the employee's regular job.

Temporary Assignment - Performance of a temporary job assignment intended to return an injured employee to work at less than his or her full duties when a serious injury or serious medical condition prevents the employee from working full duty. Temporary assignments are limited to six months at the same pay, beyond six months; the program will be reviewed in assistance of Gallant Builders management to determine the next best course of action. Temporary assignments are modified duty and alternative duty.

Modified Duty - Modified duty allows the employee to return to employment in his/her regular job and perform all of the essential functions of the position and those nonessential duties and tasks that are within the capabilities of

the employee, given the restrictions imposed by the treating health care provider. Modified duty is a temporary arrangement until the injured employee can resume full duty. If during the course of the modified duty assignment or after six (6) months, whichever is sooner, it is determined that the employee has permanent restrictions, the program will be reviewed in assistance of Gallant Builders management to determine the next best course of action.

Alternative Duty - Alternative duty allows the employee to temporarily perform the essential functions of a job and other nonessential duties and tasks, within the restrictions prescribed by the treating health care provider, other than the position for which the individual is employed (regular full-time position). Such alternative duty may be physically located in the same employing department or in a hosting department. Alternative duty is a temporary arrangement until the injured employee can resume full activities of his/her regular job or until an alternate duty position is no longer needed.

Hosting Department – This is the department that has a temporary assignment position available but not necessarily the employee's department.

Employing Department - Department that the employee is permanently assigned to for his/her full duty regular job.

Prohibited Actions

This return to work program shall not be applied to any situation or circumstance in a manner that retaliates or discriminates on the basis of race, color, sex, age, national origin, religion, or disability.

Authorization for Leave and Lost Time

An employee who must miss work due to an injury or illness must be certified by a health care provider to be off work. It is the employee's responsibility to obtain such documentation from the health care provider and to return it to the supervisor within one working day upon receipt. Employees will be reimbursed for any costs in obtaining written documentation from a health care provider with a valid receipt of payment.

If the health care provider states that the employee cannot perform any temporary assignments/ modified duties, Gallant Builders may challenge the decision depending on the injury and request independent medical information. Some Gallant Builders sites have a local health care provider that employees may be requested to visit; employees can decline without any reprisal.

Return to Work Coordination

The Safety Director will assist Superintendents and the injured workers' supervisor with return to work activities/ plans for individuals who have sustained a compensable injury or illness during the course and scope of employment.

Temporary Assignment/ Modified Work Procedures

An employee who is absent due to an injury or illness is required to submit written verification of the injury or illness from a qualified health care provider. Such verification must be submitted to the supervisor within one working day upon receipt of the documentation and in compliance the appropriate local Workers Compensation Act and Gallant Builders policy.

A copy of the employee's regular job description must be supplied to the health care provider.

If the employee is unable to perform the essential functions of his/her regular job, a temporary Modified Work Plan is developed by the Safety Director in consultation with operations management. The Modified Work Plan must be completed in writing and accepted or declined by employee. The accepted or declined plan must be forwarded to the Safety Director which will forward a copy to the local effective Worker's Compensation administrator.

The employee must obtain the appropriate forms from their supervisor or the Safety Director to be completed by his/her health care provider at each visit or every rotation, whichever is sooner, for assessment of the employee's ability to perform the functions of the temporary assignment/ Modified Work position offered and accepted.

An employee who chooses not to continue a temporary assignment/ modified job must notify the employing/hosting department and/ or Safety Director immediately in writing. An employee who fails to accept a local workers compensation administrator's approved temporary assignment/ modified work job and abandons his/her job may be subject to disciplinary action including termination.

The period of temporary assignment is limited to a maximum period of six (6) months from the beginning date of the temporary assignment, or the duration of the medical condition, whichever ends first. The employee shall perform the duties of the temporary assignment for the term of the assignment or until the employee is able to return to full duty, whichever is sooner. The employing department is expected to provide temporary assignment/modified work jobs.

Employee Reporting Responsibilities

An employee who is a candidate or participant in a modified or alternative duty temporary job assignment under the Return to Work program is responsible for reporting to Workers Compensation carrier any employment or income earned while performing modified or alternative duty if required by the Workers Compensation carrier.

An employee participating in the Return to Work program must provide his/her supervisor with medical documentation accounting for all absences due to the injury/illness within one day of any absence from work, or face disciplinary action, up to and including termination.

Non-Retaliation

Retaliation against an individual for in good faith filing a request or making a claim under this or related policies, for instituting or causing to be instituted any proceeding under local regulatory guidelines or federal anti-discrimination or anti-retaliation laws, for testifying in an investigation or proceeding, or for otherwise opposing discriminatory or retaliatory actions or practices will not be tolerated. Retaliation by any Gallant Builders employee is a violation of this policy. Individuals who believe they are the victim of discrimination or retaliation and those who suspect discrimination or retaliation should report the matter to their immediate supervisor and to Human Resources.

Nothing in this procedure should be interpreted as requiring an individual to report suspected acts of discrimination or retaliation to the individual he or she believes is engaging in discriminatory or retaliatory conduct.

5.3 Records and Records

Management OBJECTIVES

- To ensure key records are properly filed and readily accessible
- To ensure regulatory records are retained for the applicable regulatory requirement periods
- To ensure key records are removed from files and destroyed when the applicable retention period is reached
- **RESPONSIBILITIES**

Safety Director

Identifies safety and health records; identifies record storage location and retention requirements and identifies records to be destroyed.

PROCEDURE

5.3.1 Access to Medical Records

Safety and health records will be identified by the Safety Director and are maintained based on legal, regulatory and business requirements.

The Safety Director will maintain applicable medical and exposure records for all employees. All requests to access medical and exposure records and analysis based on those records must be submitted to using the forms provided for that purpose.

The Safety Director will assure access of each employee and/or their designated representative, to all exposure and medical records concerning the employee's work conditions or workplace within 15 working days from the day request is made. If the records cannot be provided within 15 working days, the employee or designated representative requesting the record shall be informed with the reason(s) for the delay and the earliest date when the record(s) can be made available.

Any designated representative must have the employee's written permission for access to exposure records and analyses. It is necessary however, for the union representative to specify the occupational need for access to records absent the employees consent.

The authorized physician, nurse or other responsible health care personnel maintaining employee's medical records may delete the identity of anyone who has provided confidential information concerning the employee's health status but cannot withhold the information itself.

When an analysis of medical records identifies the employee, a physician may remove direct or indirect personal identification. If this cannot be done, the personally identifiable portions need not be provided to the person seeking such information.

Employees and their designated representatives will be permitted upon request access to past and present exposure data to toxic substances or harmful physical agents.

Copies of exposure records of other employees with past or present job duties or working conditions like or

similar to those of the employee will also be provided upon request.

Any employee or designated representative is also permitted access to any record of exposure information which pertains to a new workplace or condition(s) to which the employee is being assigned or transferred.

5.3.2 Records Filing andAccessibility

Safety and health records shall be legible, identifiable and traceable to the activity, product or service involved. The records shall be stored in identified secured locations and maintained in such a way that they are readily retrievable and protected against damage, deterioration or loss.

5.3.3 Key Records Retention

The Safety Director reviews records files annually to determine which records are to be destroyed, considering safety and health records that have met their retention period.

KEY RECORDS RETENTION SCHEDULE

RECORD NAME	RETENTION	RECORD STORAGE LOCATION
Incident Investigation Documentation	10 years	Site, Archives and Server
Safety Inspection Checklist/Safety Audits	5 years	Site, Archives and Server
Management Of Change Records	5 years	Site, Archives and Server
Corrective Actions Tracking Log	5 years	Site, Archives and Server
Training Records	5 years	Site, Archives and Server
Physical Exam & Medical Records	30 years	Human Resources & Storage
Incident Notices	5 years	Site, Archives and Server
Safety Observation Forms	2 years	Site, Archives and Server
Hazardous Chemicals Inventory List	5 years	Site, Archives and Server
Site Specific SH&E Plans	5 years	Site, Archives and Server
Weekly Safety Meetings	2 years	Site, Archives and Server
Management Review Meeting Minutes	5 years	Site, Archives and Server

5.4 Inspection

OBJECTIVE

To provide a method to review and verify compliance with the Gallant Builders SHMS.

RESPONSIBILITIES

Safety Director

- Ensures inspections are conducted
- Develops the inspection schedule and scope
- Communicates inspection findings
- Verifies non-compliance and non-conformance areas are corrected
- Tracks inspection findings and communicates progress toward closure of findings

Project Managers

- Develops and implements corrective and preventive action for deficiencies
- Tracks inspection findings until the responsible party has corrected the deficiencies
- Conducts monthly site safety inspection

Superintendents

- Develops and implements corrective and preventive action for deficiencies
- Tracks inspection findings until the responsible party has corrected the deficiencies
- Conducts weekly site safety inspection

PROCEDURE

5.4.1 Formal Annual Inspection

The Safety Director or his designee conducts formal inspections (scheduled or unannounced) no less than once per year per location.

5.4.2 Routine Site Inspection

Every quarter the senior staff member at each job conducts a site safety inspection using the Gallant Builders Safety Inspection Checklist. The completed inspection checklist is sent to the Safety Director with a copy to the appropriate project manager.

5.4.3 Conducting Inspection

The inspector completes the Safety Inspection form for each inspection by interviewing people, reviewing records and touring the site.

An inspection closeout meeting is held between the inspector and appropriate site personnel to review information and identify areas of non-conformance.

Findings are communicated to the appropriate project manager and Safety Director by sending a copy of the checklist to these positions.

5.4.4 Corrective and Preventive Actions

Non-conformances are corrected and are the primary responsibility of the appropriate project manager and will be monitored by the Safety Director.

6.0 MANAGEMENT REVIEW

OBJECTIVES

- To ensure continuing suitability, adequacy and effectiveness of the SHMS
- To address needs for changes to our policy, objectives and other elements of the SHMS
- To identify opportunities for continual improvement

RESPONSIBILITIES

Safety Director

- Reviews safety and health compliance status and SHMS effectiveness with top management
- Updates the SHMS where appropriate based on decisions made in the Management Review
- Implements changes identified in the management review process and resource assessment

PROCEDURE

6.1.1 Safety Management System Review

The Gallant Builders Safety & Health Management System is reviewed at least annually by the Safety Director to evaluate its success in meeting the goal and objectives for safety within Gallant Builders.

The Safety Director maintains a record of the review. Results of the annual review are incorporated into changes to the Gallant Builders Safety & Health Management System manual, site specific SH&E plans or appropriate safety procedures.

6.1.2 Management Meetings

On a schedule, determined by the Gallant Builders President, senior Gallant Builders management must meet at least annually and address the following subjects:

- Review of Performance (Objectives & Safety Programs)
- Corrective Actions and Inspection Review
- Safety and Health Management Resources Adequacy
- Operational Controls
- Roles and Responsibilities
- Review of Safety and Health Policy

Meeting results are documented through meeting agendas and minutes that include an executive summary and a summary of post review action items.

SPECIFIC SAFETY PROGRAMS