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1. PURPOSE

1.1. This program is intended to assist Gallant Industrial in identifying short service employees and help keep new employees, whether experienced or inexperienced, adapt and adjust to new job sites.

2. SCOPE

2.1. This policy applies to all Gallant Industrial projects. It is important to ensure that newly placed employees work under the direction of experienced personnel.

2.1.1. For transient type and short-term projects that are anticipated to last less than 180 days at work sites and locations that do not have a nested Gallant Industrial presence, alternate safeguards shall be implemented via the Safety Execution Plan.

2.2. Short Service Employees should make up no more than 50% of a single crew at one time.

2.2.1. If Necessary, a mitigation plan will be developed if this percentage can not be avoided.

2.3. A Short Service Employee (SSE) shall be under this program for at least 180 days (only exception a Site Safety Mature employee) until the SSE demonstrates the knowledge and skills necessary to perform their tasks safely.

3. DEFINITIONS

3.1. **Mentoring** - A process of transferring skills and knowledge from one person to another in a work environment. All Supervisors (Foreman and above), Safety, and Quality Control employees are hired as mentor status employees and are required to fulfill the mentor requirements of this policy.

3.2. **Supervisor** - The individual responsible for the direct supervision and oversight of an employee.

3.3. **Short Service Employee (SSE)** - A newly placed full-time or temporary employee or subcontractor with less than 180 days' experience at an assigned work location.

3.4. **Short Service Employee Mentor** – An employee with at least 180 days' employment with the company at an assigned work location who has demonstrated safe and efficient work habits.

3.5. **Site Safety Mature Employee** – An employee with less than 180 days employment at an assigned work location but more than 180 days employment with the company and has demonstrated safe and efficient work habits. This designation can only be approved by Site Operations Lead and Site Safety Lead.

3.5.1. The Site Safety Mature Employee is neither a Short Service Employee nor a Mentor.

3.5.2. The Site Safety Mature Employee will not serve as a mentor unless a status change is approved and has met the 180 days of employment at an assigned work location.

4. MANAGEMENT RESPONSIBILITIES

4.1. The responsibilities of Gallant Industrial leadership and management are to set expectations, evaluate effectiveness and:

4.1.1. Prior to starting work, Gallant shall notify the client/host facility that a Short Service Employee(s) are present on work crews and will be working onsite, as required per client/host facility.

4.1.2. Make and demonstrate a personal commitment to a strong and functional Safety Health and Environmental work culture,

4.1.3. Comply with this written policy that sets compliance expectations for management and employees for SSEs,
4.1.4. provide employees with access to company policies, standards and procedures as applicable,
4.1.5. establish written orientation and Short Service Employee Programs for all employees newly assigned to any job location,
4.1.6. ensure that all employees new to a job assignment are identified to the supervisor(s) responsible and put through the orientation and Short Service Employee Programs,
4.1.7. audit, review performance and take timely corrective actions to continually improve the effectiveness of the orientation and Short Service Employee Programs.
4.1.8. Review and Approve employees moving from SSE status to Mentor or Site Safety Mature Status.

5. SUPERVISOR RESPONSIBILITIES

5.1. The responsibilities of Supervisors in the Short Service Employee Program are:
5.1.1. notify Gallant when a Short Service Employee is assigned to the project,
5.1.2. know which jobs and crews are using Short Service Employees,
5.1.3. ensure Short Service Employees are appropriately identified per this plan,
5.1.4. develop and communicate Hazard Analysis (STA's / JSA's Etc.) to affected personnel upon initial assignment and when the operation changes as applicable,
5.1.5. ensure Short Service Employee Mentor possesses proper knowledge and skills in the task assigned,
5.1.6. ensure Short Service Employee Mentor is providing adequate SSE interaction and transfer of knowledge,
5.1.7. ensure Short Service Employee is gaining the necessary knowledge and skills in the job tasks, and
5.1.8. follow all safety rules and company policies.

6. MENTOR RESPONSIBILITIES

6.1. The responsibilities of the Mentor in the Short Service Employee Program are to:
6.1.1. be an experienced and responsible person assigned by the supervisor to work with the new employee,
6.1.2. be selected based on a history of safe work and policy/procedural knowledge,
6.1.3. be able to communicate the expectations and characteristics of work tasks and their associated hazards,
6.1.4. possess knowledge and skills in the job tasks assigned to the SSE,
6.1.5. be willing and able to effectively listen to the SSE to determine if the SSE is learning and retaining the knowledge being shared,
6.1.6. be willing to watch a SSE perform a job without interfering as long as the SSE is not in a position to harm themselves, others, the environment or the equipment,
6.1.7. adopt a positive safety attitude, avoid criticism, and strive to build confidence and self-esteem in the SSE,

6.1.8. be able to teach the SSE the proper way to create a quality Hazard Analysis (STA's / JSA's Etc.) and to follow that Hazard Analysis (STA's / JSA's Etc.) in performing tasks,
6.1.9. keep abreast of new equipment in their field of expertise,
6.1.10. refrain from taking shortcuts and doing anything else that jeopardizes health or safety,
6.1.11. demonstrate a positive work ethic at all times, and
6.1.12. introduce the **SSE Checklist** to the new employee. The checklist is a tool to train the new employee and monitor progress,
6.1.13. review the checklist with the new employee periodically over a 180-day period, and forward the information for supervisor and management review, and
6.1.14. follow all company policies and procedures.

7. SHORT SERVICE EMPLOYEE RESPONSIBILITIES

7.1. The responsibilities of the Short Service Employee are to:
7.1.1. never work alone and be under the supervision of their mentor,
7.1.2. be willing to watch and listen to the Mentor,
7.1.3. establish a positive safety attitude toward assigned job tasks,
7.1.4. learn how to create and follow Hazard Analysis (STA's / JSA's Etc.),
7.1.5. be willing to learn how to do each task in a safe and environmentally sound manner,
7.1.6. stop and report unsafe conditions immediately,
7.1.7. participate in safety meetings, and
7.1.8. follow all safety rules and company policies.

8. SITE SAFETY MATURE EMPLOYEE RESPONSIBILITIES

8.1. The Site Safety Mature Employee is neither a Short Service Employee nor a Mentor.
8.2. The Site Safety Mature Employee will not serve as a mentor unless a status change is approved and has met the 180 days of employment at an assigned work location.
8.3. For the purposes of this policy, the Site Safety Mature Employee will be responsible for;
8.3.1. performing safe quality work to the best of their ability.
8.3.2. serving as a good example while working alongside SSEs.
8.3.3. follow all safety rules and company policies.

9. GALLANT INDUSTRIAL SAFETY RESPONSIBILITIES

9.1. The responsibilities of the Gallant Safety contact in the Short Service Employee Program are to:
9.1.1. serve as subject matter resource to support the Supervisor and SSE.
9.1.2. ensure the SSE gets the necessary safety training and work with site supervision to ensure SSEs follow all policies and procedures.

10. REQUIREMENTS

The following requirements apply to the Short Service Employee Program.

10.1. ORIENTATION

10.1.1. Site Leadership and Safety will provide a company-approved orientation. The orientation will include a Job Orientation Checklist that the supervisor reviews with each newly hired employee.

10.1.2. Each SSE will be provided with orientation specifically based on job position and job-related topics prior to performing job tasks.

10.1.3. Each SSE will be taught how to access company policies, standards and procedures.

10.1.4. Satisfactory completion of the orientation must be signed and dated by the employee and supervisor.

10.2. TRAINING / Mentorship

10.2.1. The supervisor shall ensure that each SSE is properly trained per federal, state, industry, company and operator/client requirements before starting work when:

10.2.2. the employee is hired;

10.2.3. the employee is appointed a new job assignment; and

10.2.4. the employee is exposed to new substances, processes, procedures, equipment, etc. that represent a new hazard to the employee.

10.2.5. The supervisor shall ensure that each SSE is properly trained in:

10.2.6. the hazard(s) present in the workplace;

10.2.7. the policies, procedures, processes and PPE utilized to control these hazards and prevent illnesses, injuries, property damage and/or environmental incidents; and

10.2.8. the skills necessary to conduct their assigned jobs safely and efficiently.

10.3. IDENTIFICATION SYSTEM

10.3.1. It is important for supervisors, co-workers and project managers to recognize a Short Service Employee; therefore, an identification system is developed for this purpose. The identification system is a means of communicating to the workforce that the Short Service Employee is in a transitional period. It will not be a designation of in-experience or used to mark an employee as having lower skill sets.

10.3.2. The SSE shall be identified by a high visibility colored (fluorescent orange) hardhat band that prominently identifies the employee as an SSE employee. The hardhat band shall indicate when the employee is no longer considered to be a Short Service Employee. The Supervisor and the SSE Mentor will provide supervision and not allow the SSE to perform any task in which they have not been properly trained. The Supervisor and the SSE Mentor will ensure that the SSE understands the task to be performed and the associated hazards.

10.4. APPROVAL PROCESS – FROM SSE TO MENTOR OR SITE SAFETY MATURE EMPLOYEE

10.4.1. Upon expiration of the SSE term, Gallant Industrial Leadership, the Supervisor and the SSE Mentor shall verify that the SSE exhibits a knowledge and skill level to perform the job tasks assigned.

10.4.2. The Supervisor shall request updated status via the completion of:

10.4.2.1. Short Service Employee Checklist

10.4.2.2. Short Service Employee Job Orientation.

10.4.3. Gallant Industrial Leadership (Site Operations Lead and Site Safety Lead) shall approve any status updates prior to the change being made.

11. DOCUMENTATION

11.1. All records for the SSE Orientation and Training should be maintained at the employee's location by the supervisor with assistance from the Gallant safety department. Including:

11.1.1. Short Service Employee Checklist

11.1.2. Short Service Employee Job Orientation.

12. SSE QUALITY ASSESSMENT AND CONTROL

12.1. Management should review the effectiveness and quality of the Short Service Employee Program at least annually.

12.2. SSE Orientation and Training documentation should be audited for accuracy, timeliness and completeness.

12.3. Onsite inspections should be conducted to ensure that supervisors, mentors and Short Service Employees are adhering to the SSE Program.

12.4. The number of incidents involving new employees should be measured, compared to the general workforce and evaluated for trends or performance variations.

12.5. Management should ensure that all program deficiencies are promptly corrected and documented.

13. References

13.1. Short Service Employee Job Orientation.

13.2. Short Service Employee Checklist.

13.3. Short Service Employee Notification Form.