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SUBPART A - SCOPE

Berry Bros. encourages all personnel including subcontractors engaged in field operations for BBGCI to participate in the Behavior Based Safety Observation program whether it is BBGCI's or the client's program unless otherwise exempted by senior management.

Involved personnel shall develop critical safety behavior checklists and behavioral observation methods (i.e.: "Observation Card"). The task at hand will be performed within established controls. Workers and observers shall establish safe acts baseline behavior; begin observation and calculation of the percentage of safe acts. Provide feedback to workers and observe improvement in the percentage of safe acts and other measures (i.e.: OSHA).

SUBPART B – OBJECTIVE

To establish a behavior safety process that is proactive in preventing and eliminating unsafe acts or conditions, improving safety performance, achieving safety goals and meeting BBGCI and client behavior program expectations.

SUBPART C - DEFINITIONS

At Berry Bros. General Contractors, Inc., the behavior-based observation and feedback process provides visibility and control over upstream indicators of safety performance; namely, safe and at-risk behaviors. These observations provide direct and measurable information on employees' work practices identifying both safe and unsafe behaviors.

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This is a listing of fifteen (15) potential high risk activities in which the user will select only one type. The activity types listed represent dangerous work which may lead to serious injuries and/or fatalities. These include:

- 1. Electrical work
- 2. Excavation work
- 3. Hot work
- 4. Lifting & rigging work
- 5. Marine work
- 6. Vehicle operations
- 7. Working from heights
- 8. Working in confined spaces

- 9. Working in the presence of H2S
- 10. Working on/near energized systems
- 11. Working with chemicals & hazardous materials
- 12. Working with explosives
- 13. Working with or around mobile equipment
- 14. Working with pressurized systems
- 15. Other

"At Risk Behavior" – An undesirable behavior that poses a potential risk to personnel, property, or environment.

"Barriers" – are an organized breakdown in the safety management system that may be perceived to exist, which blocks or impedes safety performance. The barrier (s) can have a negative influence on the organizational performance. There are nine (9) barrier types included in the BBS tool as follows:

- 1. <u>Management / Supervision</u> Motivation, attitude, and leadership non-responsive, allows at risk behavior to exist or taking short cuts to get the job done, budget.
- 2. <u>Policy Procedure</u> Existence, completeness, comprehensiveness, non-routine task, risks no known.
- 3. <u>Knowledge/Understanding</u> Don't know, not understood, never trained, unqualified, too long since training, unusual task, or lack of experience.
- 4. <u>Time Constraint</u> Schedule, system pressure, hurry, priority, communication, or job planning.
- 5. <u>Personal Factor/Choice</u> Mental slip, not thinking, min not on task at hand, preoccupied, selfimposed pressure, motivation, attitude.
- 6. <u>Facility / Equipment Condition</u> Design, modification or deteriorating condition contributing to at risk behavior.
- 7. <u>Accepted Culture or Peer Pressure</u> doing the worn thing because co-workers do, going along with the crowd, rather not rock the boat.
- 8. Environmental Related Weather, wildlife, insects, remote location
- 9. <u>Other</u>

"Behaviors" are range of actions and mannerisms made by individuals in conjunction with themselves or their environment. Behaviors can either be "Safe" or "At Risk" resulting from conscious or subconscious, overt or covert, and voluntary or involuntary. A safety risk does not pose a risk to personnel, property, or the environment. An "At Risk" behavior poses a potential risk to personnel, property or the environment.

Behavior Category – this is a group of seven (7) categories that the user will select based on the observation to be recorded. One or more categories may be selected if needed.

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- 1. Tool, Equipment and Machinery
- 2. Personal Protective Equipment
- 3. Position Factors
- 4. Human Factors
- 5. Lifting and Rigging
- 6. Vehicle Operations
- 7. Environmental and Housekeeping

Behavior Safety Process - Is a proactive approach in preventing or eliminating actions or conditions by changing unsafe behaviors.

Condition - An unsafe condition is an unsatisfactory physical condition existing in a workplace environment that varies from a normal accepted safe condition and can result in injury, death, property damage or environmental harm if not reported and corrected properly. Within the context of this behavior program a "condition" shall be recorded which cannot be otherwise linked to a specific observable behavior. For example, if an employee is observed creating an unsafe condition by leaving an open hole which is not barricaded or attended, then he/she has performed an unsafe behavior and this observation would more appropriately be recorded as such. If on the other hand, an open hole is observed and there is no knowledge of the responsible party who created the unsafe condition, then this condition would be more appropriately recorded as an unsafe condition.

Corrective Action - Are improvements taken to eliminate causes of non-conformities or other undesirable situations of identified problems or identified risks in an attempt to prevent their recurrence (for corrective action) or to prevent occurrence (for preventative action).

Hazard – Anything that has the potential to cause harm to personnel, property or environment.

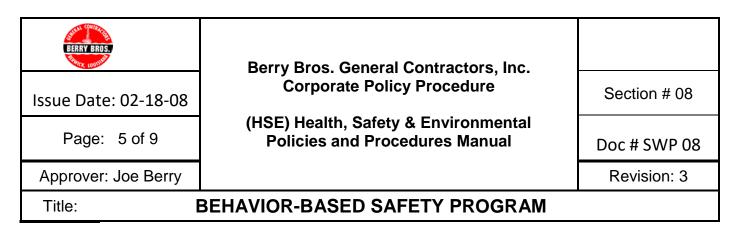
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Hazard Energy Source: An energy source that may result in harm or injury to people, property, or the environment. There are ten (10) common energy sources:

- 1. Gravity The force caused by the attraction of all other masses to the mass of the earth. Examples: dropped objects, collapsing roof, and a body tripping or falling.
- Motion The change in position of objects or substances. Examples: vehicle, vessel, or equipment movement; flowing water; wind; and body positioning when lifting, straining, or bending
- 3. Temperature The measurement of differences in the thermal energy of objects or the environment, which the human body senses as either heat or cold. Examples: open flame; ignition sources; hot or cold surfaces, liquids, or gases; steam; friction; and general environmental and weather conditions,



- 4. Pressure Energy applied by a liquid or gas that has been compressed or is under a vacuum. Examples: pressure piping, compressed cylinders, control lines, vessels, tanks, hoses, and pneumatic and hydraulic equipment.
- 5. Mechanical The energy of the components of a mechanical system, i.e., rotation, vibration, or motion within an otherwise stationary piece of equipment or machinery. Examples: rotating equipment, compressed springs, drive belts, conveyors, and motors.
- 6. Biological Living organisms that can present a hazard. Examples: animals, bacteria, viruses, insects, blood-borne pathogens, improperly handled food, and contaminated water.
- 7. Chemical The energy present in chemicals that inherently, or through reaction, has the potential to create a physical or health hazard to people, equipment, or the environment. Examples: flammable vapors, reactive hazards, carcinogens or other toxic compounds, corrosives, pyrophoric, combustibles, oxygen-deficient atmospheres, welding fumes, and dusts.
- 8. Sound Sound is produced when a force causes an object or substance to vibrate and the energy is transferred through the substance in waves. Examples:



equipment noise, impact noise, vibration, high-pressure release, and the impact of noise to communication.

- 9. Radiation The energy emitted from radioactive elements or sources and naturally occurring radioactive materials (NORM). Examples: lighting issues, welding arcs, solar rays, microwaves, lasers, X-rays, and NORM scale.
- 10. Electrical The presence and flow of an electric charge. Examples: power lines, transformers, static charges, lightning, energized equipment, wiring, and batteries

Intervening feedback – When an individual identifies an unsafe behavior that does not pose immediate risk or danger and intervenes during the work to correct the unsafe behavior.

Positive feedback – Feedback given by an observer to a co-worker that is intended to acknowledge the safe behavior observed and to reinforce continued safe behavior.

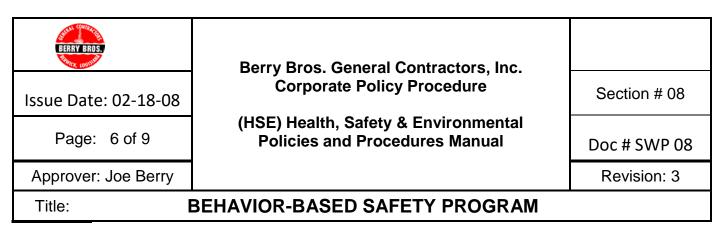
"Safe" Behavior – A behavior that does not pose a risk to personnel, property or environment

SUBPART D – ROLES & RESPONSIBLITIES

Employees participating in the behavioral observations are required to provide direct, measurable information on employees' work practices identifying both safe and unsafe behaviors. Management has the ultimate responsibility for ensuring the effective implementation and on-going performance of BBGCI behavior program in accordance with this policy. The safety coordinator(s) are responsible for the management of the behavior safety program. Employees are responsible for the following but not limited to: providing orientation training and coaching in the performance of the system, and accessing training. The Safety Coordinator is not solely responsible for the implementation of the BBSP. In order to be effective, all employees, at all levels in BBGCI must take responsibility for the BBSP implementation. The following specific duties for managing this program include but are not limited to the following:

Management

- 1. Support the process efforts.
- 2. Be visibly involved at meetings periodically.
- 3. Provide necessary resources.



- 4. Support decisions of the process
- 5. Provide feedback.
- 6. Set goals.
- 7. Be a role model.

Supervisors/Persons Leading Work:

- 1. Support the process with a positive attitude by encouraging participating in the behavior safety process.
- 2. Provide employees with the time, equipment, and instruction necessary to make quality observations.
- 3. Validate the process by making frequent observations.
- 4. Review trends and implement corrective action plans developed from the recorded behaviors, and any corrective actions identified.
- 5. Fully participate in the process.

Observers:

- 1. Perform observations to the best of their abilities.
- 2. Responsible for being consistent in the observation process.
- 3. Reporting the true findings of the observations.
- 4. Reinforce Safe Behaviors observed first
- 5. Doing their best to make at least **2** quality observations every month.
- 6. Do not become enforcers of the policy, or "policemen" doing observations.
- 7. Solicit from observed employee explanation of his/her unsafe behavior with openended questions

Observee's:

- 1. Responsible for being a willing participant in the observation process.
- 2. Responsible for giving and being open to receiving feedback
- 3. Responsible for monitoring him/herself while performing their normal work tasks.
- 4. Responsible for treating observers with courtesy and respect.

Safety Coordinator:

- 1. Communicate with management and supervisors.
- 2. Organize the data gathering, input, and analysis.
- 3. Coordinate training of employees and observers.
- 4. Produce trends and analysis of observations.

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- 5. Develop action plans.
- 6. Provide training to all workers involved in the process.

SUBPART E - TRAINING

All employees including management, supervisors, existing and new employees will be covered in the training program. The BBSP training will be completed prior to the first assignment and annually thereafter in BBGCI's BBS program. Each employee participating in this program is expected to understand the critical behaviors necessary for working safely, and understand the process of recording safe and at risk behaviors, providing feedback and identifying corrective actions. This training may be completed in the classroom or on the job, and SafeWork Solutions BBSP training videos imbedded in the SafeWork Suite[™] Behavior Based Solution tool. This policy will be utilized as a guide to review the applicable training content listed below.

- General BBSP awareness concepts,
- Program objectives,
- How to conduct the observation,
- What do the critical work behaviors mean,
- Feedback training and role play (mentoring and coaching).

How to complete the observation using the SafeWork Suite[™] application

SUBPART F- Observation & Feedback Procedure

As employees become more comfortable with the informal observation process, they will begin to observe and give behavior-based feedback informally as safety coaching becomes a natural part of the work culture.

Actively caring feedback from peers is a powerful motivator for safety improvement behaviors, but is not sufficient for a Total Safety Culture. For lasting improvement, system-level causes of at-risk behavior must be addressed.

Upon completion of an observation, the observer is expected to review the observation(s) with observed employee. During this process, the following protocols should be followed:

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- 1. Review the observation(s) with observed employee.
- 2. Provide positive feedback by praising safe behaviors first. The goal of this step is to acknowledge safe behavior observed and reinforce continued safe behavior.
- 3. Solicit from observed employee an explanation of his/her unsafe behavior with open-ended questions. Draw out the corrective action that may be required from the person.
- 4. Identify the barrier that may exist to performing the task safely.
- 5. Re-emphasize no consequence to observed employee. Get a personal commitment that the individual will carry out this action and thank the person for participating.

The observation must be recorded using application. A printed observation card may be used to collect the data until access to the application can allow for data to be recorded in the SafeWork Suite BBS application.

SUBPART G – Data Collection & Trend Analysis

The SafeWork Suite[™] application dashboard feature will trend observation data. Additional management reporting features are available in the software to allow for user specific reporting. The reporting features of the SafeWork Suite[™] provide real-time measurements and tracking of BBS observations to assist in analysis of data, statistical comparisons and sharing of results to the workforce. The results of the BBS trends and any focus action plans will be discussed at regulatory scheduled safety meetings.

Action plans may be created where appropriate to address trends of unsafe behaviors or re-directing attention of the workforce to a specific behavior category (e.g. Lifting and rigging). The action plans can be communicated through the Behavior Based Solution home page of the Safework Suite[™] application. Action planning will include:

- Evaluate unsafe behaviors from trend analysis and prioritize
- Develop action plan for unsafe behaviors based on comments and feedback from cards
- Designate responsible parties and timeframes within the action plan
- Define who is responsible for action planning
- Ensure management support

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Once action plans have been implemented a follow-up on action plan can be completed using the custom BBS reporting feature analytics provided in the Safework Suite[™] software. The purpose of the follow up step is to ensure that action plans are carried out over the course of a set time period. Follow-up is necessary to ensure the closure of all actions listed with the action plan. The follow-up process will include:

- Define a frequency for review of action plans
- Assign accountability for closeout of action plans within the organization

Attachment: "Behavior Based Safety Observation Card" "Safework Suite Hazard Wheel"

Revision Date: <u>03-20-08, 08-28-09,</u> <u>06-17-15</u>

Approved By: <u>Joe Berry & Safety Committee</u>

			Lifting and Rigging	Safe	At Risk
	414		Selection		
			Inspection		
Observer Name:			Use		
Customer:			Lift Plan		
Co. Location:	Date:		Capacity		
			Stability		
Worksite:			Signaling/communications		
Activity Type:			Taglines/load control		
Task Observed:			Other:		
		I	Vehicle Operations	Safe	At Risk
Activity Covered in JSEA?	Yes	No	Selection		
Was unsafe Condition Observed? Describe below:	Yes	No	Inspection		
			Use		
		I	Seat belt(s)		
		I	Load securement		
Tools, Equipment & Machinery	Safe	At Risk	Distracted driving behavior		
		AL NOK	Road/driving conditions		
Selection Selection			Journey management plan		
Inspection			Other		
Use			Environmental & Housekeeping	Safe	At Rist
PPE	Safe	At Risk	Walking and working surface		
Head			Storage practices		
Eve/Face			Trash and debris		
Hand protection			Lighting		
Hearing protection			Temperature extremes		
Foot			Wind direction/speed		
Body/FRC			Ventilation		
Respiratory protection	<u> </u>		Waste management		
Flotation device			Permit compliance		
Fall protection			Other		
Personal Factors	Safe	At Risk	Barriers to Safework	Safe	At Risk
		AL NDK	Management/Supervision		
Working at heights			Policy Procedure		
Line of fire			Knowledge/Understanding		
Pinch point/crush point			Time Constraint		
Working under load			Personal Factor/Choice		
Ergonomic Factors			Facility/Equipment Condition		
Clearance Distance			Accepted Culture or Peer Pressure		
Other:			Environmental Related		
Human Factors	Safe	At Risk	Other		
Pace of work			Was Stop Work Authority Used	Yes	No
3 point contact					
Eyes on path/task			Describe:		
Hazard Recognition			* 		
Communications with others					
Mental Factors				NO	PK
Fatigue				ŤE	
Other:					-

