

Manual Section 7	Issue Date 11/14/07	Revision Date 01/15/26	Policy Number LLCP-058
Behavioral Based Safety			

Purpose

The Company has always taken a proactive approach to injury prevention that focuses on at-risk behaviors that can lead to an injury and on safe behaviors that can contribute to injury prevention. This is the meaning of behavior-based safety. Instead of being responsible for accidents, our company encourages managers to be responsible for creating an accident prevention process. This Behavior-Based Safety Program provides both a guiding vision and flexible procedures by which we prevent at-risk behaviors and promote safe ones.

Scope

All GIS Holdings, LLC Companies and affiliates including, Blanchard Industrial, LLC, GIS Engineering, LLC, Grand Isle Shipyard, LLC., GWIS, Mack Steel, NuWave, Valvemax, Discovery Industries, Inc., Global Inspections, LLC, and EIS, hereafter identified as “Company”.

Administrative Duties

The Corporate HSE Director is responsible for developing and maintaining the written Behavior-Based Safety Program. This program is kept up to date on the Safety Portal.

Corporate Performance Goals

In our proactive approach to injury prevention, we have developed the following corporate-level, safety-related goals and objectives:

Annual Safety Goals:

- Provide targeted technical and safety related assistance to each Division to make sure they understand how to comply with all government federal and state regulations.
- Promote job safety training.
- Work with Divisions to improve safety performance and commitment to safety by all employees.
- Develop and review safety policy and procedures, which will prevent accidents and incidents on jobs.
- Continuously monitor accidents and incidents trends for prevention of accidents and incidents.
- Encourage best practices to further improve the Company’s Safety Program.
- Develop and deploy system-level solutions to safety challenges.
- Encourage feedback from employees in field.
- Communicate and written report monthly of all accidents, incidents and changes to government regulations.
- Set Standards for Sub-Contractor Evaluation.
- Enforce and improve the L.I.F.E. Program

These goals have been communicated to all levels of the company. However, each work area of the company is able to attain its own specific safety goals. And we encourage individual participation by all members of the organization. We empower employees to set and achieve their own safety goals. Employees are trained and encouraged to set individual goals and advise as these individual goals are met. This helps to get all employees committed in the BBS program.

Training:

The training program shall:

- Define who is trained and how much
- General employee awareness

Manual Section 7	Issue Date 11/14/07	Revision Date 01/15/26	Policy Number LLCP-058
Behavioral Based Safety			

- Ensure that all employees involved in the process are trained in the classroom or on the job

Types of training shall include:

- Management training
- New employee training
- Refresher training

This training will include:

- Program objectives and incident metrics reviewed
- How to conduct the observation
- How to complete the observation form
- What do the behaviors mean
- Feedback training and role play (mentoring and coaching)
- Employees should be aware they may be observed at any time

Moving Motivations toward Safety

When it comes to behaviors, some say if people think safety, then they will act safely. But it may also be true that if a person acts safely, eventually he/she will think safety. Then those safety thoughts will encourage safe behavior. This starts a cycle.

We encourage employees to set their own goals. These goals could be specific productivity or safety-related goals.

We also provide these opportunities for personal learning and peer monitoring. The Company provides safety training, weekly safety meetings, daily JSEA's, job site training and daily tailgate safety meetings. These are ways employees have the opportunities to improve their personal goals.

Secure Working Environment

Our company tries to provide a secure working environment by encouraging two-way communication. Our Company holds meetings where teams are set up. The meetings include employees and management to monitor and evaluate policies and procedures that are listed as required attention. They are sent to employees and all management. Of course, a secure working environment can mean a safe working environment. We recognize that employee behavior alone cannot guarantee a safe environment. We also provide a workplace free from recognized hazards (both physical and behavioral). All employees have the right to work in areas that are free from recognized hazards that are either causing, or likely to cause, death or serious harm.

To keep our workplace free of hazards, we have implemented a system for:

- Good hazard communication
- Efficient hazard identification
- Thorough hazard evaluation
- Established methods of hazard control
- JSEA's and safety meetings
- New Hire Employee Orientation

Manual Section 7	Issue Date 11/14/07	Revision Date 01/15/26	Policy Number LLCP-058
Behavioral Based Safety			

Defining Behaviors

It is important to list hazardous tasks that may cause injury or illness in each work area. From these we have developed a list of correlating safe behaviors. That way it is clear what is a safe behavior.

For instance, lifting has a sequence of safe behaviors:

- Determine the weight of the load
- Check for a clear path to destination
- Bend the knees and use the legs
- Change foot positions to turn and don't twist the body

Each listed safe behavior will be observable so that we can determine whether improvement has been made.

Observation and Feedback

Our observation methods are as follows:

- We randomly assign employees to observe other employees to see if they perform a given set of safe behaviors.
- Observers record how many listed behaviors were performed safely and how many were unsafe.
- No names are recorded, only observations. L.I.F.E. program is being implemented.
- Upon completion of an observation, the observer is expected to have a discussion with the observed to get feedback. The observer will:
 - Review the observation with observed employee
 - Start with a positive comments
 - Reinforce safe behaviors observed first
 - Describe and discuss what was unsafe
 - Solicit from observed employee explanation of his/her unsafe behavior with open-ended questions
 - Re-emphasize no consequence to observed employee.

Evaluate and Record

All observations are recorded and sent to the LIFE Group who shall file them in the Corporate Safety Management Program (SMP). Our feedback methods are as follows:

- Observations are uploaded into the SMP for analysis. Trends are graphed and forwarded to all entities of the Company for measurement, tracking, and numerical & statistical comparison purposes.
- Once trend analyses are complete, appropriate action plans will be developed to address areas of concern.
- Designation of responsible parties and timeframes will be included within the action plan along with management support.
- Follow-up plans shall also be a part of our Action Plans. They will include the following:
 - Frequency for review
 - Accountability for closeout
 - Archive data

Manual Section 7	Issue Date 11/14/07	Revision Date 01/15/26	Policy Number LLCP-058
Behavioral Based Safety			

Team Building

Teams are an important part of the success of our Behavior-Based Safety Program. With teams no one person has to carry the program. We have organized the following teams, each with its own mission and goal, yet operating to benefit the program as a whole:

- Observation
- Hazard evaluation
- Steering
- Specific safety teams in place

Accountability System

We have an accountability system in place that encourages employees to be responsible for their own safety. This Accountability System includes all employees of the Company.

Training

Successful Behavior-Based Safety depends on a proper mind-set. This takes training. The Training Administrator will instruct all new employees in the employee orientation program of the Behavior-Based Safety Program and make arrangements with department management to schedule training. The following person(s) will conduct initial training:

Training Administrator

Our classroom instruction includes the following formats:

- Lecture
- Discussion
- Videotapes
- PowerPoint

Classroom instruction covers the following topics:

- Definition of behavior-based safety;
- The safety-related goals and objectives set at the corporate level;
- Description of motivational influences;
- How to set individual productivity and safety-related goals;
- Opportunities for personal learning and peer monitoring;
- How your company encourages two-way communication between management and employees and facilitates an atmosphere of trust;
- How your company works to free the workplace from recognized hazards via hazard communication, identification, and evaluation;
- The list of safe behaviors for the trainees' work areas and how they were/are developed and who took/takes part in their development;
- Proper observation and feedback techniques;
- Methods for intervening immediately when someone observes a person performing a behavior that could lead to injury;
- The record keeping system to track employee observation checklists;
- How observations are evaluated;

Manual Section 7	Issue Date 11/14/07	Revision Date 01/15/26	Policy Number LLCP-058
Behavioral Based Safety			

- Any evidence of injury frequency reduction after implementation of the Behavior-Based Safety Program;
- The importance of teams in a successful behavior-based safety process;
- Descriptions of the teams involved with the Behavior-Based Safety Program;
- Guiding a team to consensus regarding an issue or decision;
- The importance of a safety accountability system;
- Description of your accountability system; and/or
- The difference between accountability and responsibility for safety.

Our practical training includes these formats: Demonstrations, practical exercises and hands-on instruction. Our practical training covers the following:

- Motivational influences;
 - Hazard communication, identification, and evaluation;
 - Proper observation and feedback techniques;
 - Methods for intervening immediately when someone observes a person performing a behavior that could lead to injury;
 - The record keeping system to track employee observation checklists;
 - How to evaluate observations; and/or
 - Guiding a team to consensus regarding an issue or decision.
- Training is done in-house.

Other Program Elements

- Field observation
- JSEA's
- Safety Meetings
- Annual and Ongoing Training