

Version: <b>24.0</b>	<b>Behavior Based Safety (BBS)</b>	
	Effective Date	May 20, 2024
	Page	1 of 7

# Brunel Energy, Inc.

## Behavior Based Safety (BBS)

### Contents

1. Purpose .....	2
2. Applicability .....	2
3. Definitions .....	2
4. Responsibilities .....	2
5. Requirements .....	3
6. Procedure .....	3
7. Training .....	4
8. Recordkeeping .....	5
9. Reference .....	5
10. Appendix .....	5

Version: <b>24.0</b>	<b>Behavior Based Safety (BBS)</b>	
	Effective Date	May 20, 2024
	Page	2 of 7

## 1. Purpose

- 1.1. Brunel Energy, Inc., hereinafter referred to as, the “Company,” has established a Behavior Based Safety program to improve safety performance and decrease incident rates by bringing awareness to the daily job tasks and the risks associated with those tasks.

## 2. Applicability

- 2.1. This policy applies to employees, subcontractors and/or visitor(s) of the Company. For the purposes of this policy, an employee shall be considered on the job whenever he/she is:
  - 2.1.1. On or in, any Company or client property, including parking areas; or
  - 2.1.2. On Company time even if off Company premises (including paid lunch, rest periods and periods of being on call).
- 2.2. As a condition of employment, Company employees are required to abide by additional governmental or customer policies and requirements that may be imposed at a worksite in addition to the requirements of these policies and procedures. Nothing set forth in this policy constitutes, construes, or interprets in any way as a contract of employment.

## 3. Definitions

- 3.1. **Behavior Based Safety (BBS)** focuses on what people do, analyzes why they do it, and then applies a research-supported intervention strategy to improve what people do. The BBS program is an initiative in education and observation process used to improve safety and reduce risk in the workplace. This process uses a proactive approach and is intended to communicate to employees the elements and the procedures of Behavior Based Safety that will assist in reducing at-risk behaviors which in turn reduces injuries in the workplaces.

## 4. Responsibilities

- 4.1. Manager(s) shall:
  - 4.1.1. Actively promote and participate in the behavior safety program by supporting the goals and objectives of the Behavior Based Safety process.
  - 4.1.2. Ensure that all employees are aware of what is expected of them regarding the BBS process.
  - 4.1.3. Encourage employees to participate in observations so that incidents/injuries are reduced in the workplace.
- 4.2. HSE Supervisor(s) shall:
  - 4.2.1. Actively promote and participate in the Behavior Based Safety program by reviewing BBS Observation forms turned in at least weekly, providing feedback, and completing corrective actions as needed.

Version: <b>24.0</b>	<b>Behavior Based Safety (BBS)</b>	
	Effective Date	May 20, 2024
	Page	3 of 7

- 4.2.2. Refrain from using data from the Behavior Based Safety process in a punitive manner.
- 4.2.3. Assist in problem solving and completing corrective actions in a timely manner.
- 4.2.4. Understand the Behavior Based Safety process and the benefits of reducing at risk behaviors.
- 4.2.5. Address concerns and suggestions of employees.
- 4.2.6. Collect all observation data cards.
- 4.2.7. Enter data into the BBS database.
- 4.3. Employee(s) shall:
  - 4.3.1. Follow the safety and health guidelines.
  - 4.3.2. Wear or use required protective equipment while working.
  - 4.3.3. Report all hazardous conditions to his or her supervisor.
  - 4.3.4. Participate in the Behavior Based Safety program and complete BBS safety observations.
- 4.4. Subcontractor(s) shall:
  - 4.4.1. Follow the safety and health guidelines.
  - 4.4.2. Wear or use required protective equipment while working.
  - 4.4.3. Report all hazardous conditions to his or her Company contact.
  - 4.4.4. Participate in the Behavior Based Safety program.

## 5. Requirements

- 5.1. Pre-task analysis is a process to evaluate the work environment by performing a Job Safety Analysis (JSA) of each job. The purpose of which is to eliminate or control all hazards that may be encountered to complete the job. This process is included in the Behavior Based Safety process to establish the correct habits and work procedures in order to reduce at-risk behaviors.
- 5.2. The observation process is designed to raise safety awareness and provide a feedback mechanism for management to make changes in design, process, or procedure in order to reduce at risk behaviors.

## 6. Procedure

- 6.1. The BBS program raises safety behavior awareness through observation and feedback.
- 6.2. Key elements to the Behavior Based Safety observation process are the observation, feedback, data collection, tracking/trending, action plan and follow up.
  - 6.2.1. Observations provide direct, measurable information on employee work practices identifying both safe and unsafe behaviors. The process starts with observation of

Version: <b>24.0</b>	<b>Behavior Based Safety (BBS)</b>	
	Effective Date	May 20, 2024
	Page	4 of 7

workers – fellow employees, other contractor employees and customer employees as they perform their tasks. Observers collect information about worker safety practices and provide feedback via the observation card. The emphasis is not on who was observed but rather what behavior was observed.

- 6.2.2. During the observation, the observer records their findings on the BBS Observation form. Items to be observed include but are not limited to:
  - 6.2.2.1. Personal Protection Equipment (PPE).
  - 6.2.2.2. Procedures/methods.
  - 6.2.2.3. People.
  - 6.2.2.4. Work Environment.
  - 6.2.2.5. Equipment.
- 6.2.3. Upon completion of an observation the observer is expected to have a discussion with the observed to provide feedback. The observer will:
  - 6.2.3.1. Start with a positive comment.
  - 6.2.3.2. Reinforce safe behaviors first.
  - 6.2.3.3. Describe and discuss unsafe behaviors.
  - 6.2.3.4. Solicit from observed employee an explanation of his/her unsafe behavior with open-ended questions.
  - 6.2.3.5. Re-emphasize no consequence to observed employee.
  - 6.2.3.6. Documented feedback allows workers to assess what should be repeated and what should change to reduce risks in the workplace.
- 6.2.4. Collection of data and performing trend analysis.
- 6.2.5. Behavior Based Safety Observation forms are forwarded to the Supervisor for input in the BBS Database. Reports are generated and forwarded to management. The Company will collect data and perform trend analysis based on the information.
- 6.2.6. Action planning after the trend analysis is completed will be conducted to evaluate the unsafe behaviors and prioritize action plans. It will include the designation of the person responsible for any action steps to be completed based on the comments and feedback from data sheets. Assign time frame for completed action items and ensure management support.
- 6.2.7. Follow up to ensure the effectiveness of the BBS observation and ensure the closure of all action items listed. The follow-up will include monthly review of closeout action plans within the Company.

## 7. Training

- 7.1. The Company will provide Behavior Based Safety training for all employees. The training will include the following:

Version: <b>24.0</b>	<b>Behavior Based Safety (BBS)</b>	
	Effective Date	May 20, 2024
	Page	5 of 7

- 7.1.1. Program objectives and how incident metrics will be utilized.
- 7.1.2. How to conduct a successful observation.
- 7.1.3. Importance of proper completion of the observation card, how often, and who should receive the completed observation card.
- 7.1.4. What the behaviors mean.
- 7.1.5. Feedback and role play (mentoring and coaching).
- 7.1.6. Employees should be aware they may be observed at any time.
- 7.2. Initial training will be completed upon hire and repeated annually.

## 8. Recordkeeping

- 8.1. All safety observations will be documented using the Behavior Based Safety Observation Form.
- 8.2. All safety observations will be recorded into the BBS database for trending analysis, action plan and follow-up. The BBS database will be utilized to identify opportunities for improvement and to facilitate shared lessons learned.

## 9. Reference

- 9.1. "Introduction to Behavioral Safety" Cambridge Center for Behavior Studies.

## 10. Appendix

- 10.1. Behavior Based Safety Observation Form

Version: <b>24.0</b>	<b>Behavior Based Safety (BBS)</b>	
	Effective Date	May 20, 2024
	Page	6 of 7

**APPENDIX 10.1 BEHAVIOR BASED SAFETY OBSERVATION FORM**

Brunel Energy, Inc. Behavior Based Safety Observation									
Job						Department			
Location of operation						Date / time			
Supervisor						Phone			
Employee/Observer Name									
Employee's Observation or Recommendation:									
Feedback Provided & Outcome Comments from Person Observed:									
Safety Observation C= Concern S= Safe									
PPE / Procedures / Methods			Body Position / Mechanics			Tools & Equipment			
S	C	Eye & Head	S	C	Proper Body Position	S	C	Safe Condition – Pre job inspection	
S	C	Hand & Body	S	C	Repetitive Motions	S	C	Correct for Task	
S	C	Footwear	S	C	Sitting, Kneeling, Standing (long periods)	S	C	Safe Use	
S	C	Trained on Task	S	C	Utilize Smaller Loads				
S	C	Work Permit/JSA	S	C	Lifting, Bending, Twisting				
S	C	Focus on Task	S	C	Reaching, Pulling Pushing				

Version: <b>24.0</b>	<b>Behavior Based Safety (BBS)</b>	
	Effective Date	May 20, 2024
	Page	7 of 7

<b>Section 2: Feedback</b>	
Recognized and Reinforced Safe Behavior	
Coached and Corrected at Risk Behavior	

<b>Section 3: BBS Tracking Database updated</b>			
Name of Person Entering Data		Date	
Action or Follow Up Items in Entered Database		Date	