GRÁVITY

SECTION 1 CHAPTER 9 BEHAVIOR BASED SAFETY PROGRAM

PurposeThe Company has established a Behavior Based Safety Program (BBS)
called Job Safety Observation "JSO". The purpose of this program is to
reduce occupational injuries and accidents. It involves employees
observing one another while performing job tasks and then making note of
safe and at-risk behaviors.

Scope

This program covers all employees of Gravity Oilfield Services

In this chapter

Торіс	See Page
Conducting Observations	2
Observation Feedback	4
Data Collection and Analysis	5
Action Plan	6
Follow up Action Plan	7
Training	8



Safety Manual

Conducting Observations

Objective	The BBS safety process calls for employees to conduct observations of employees performing their regular work duties and provide feedback to co-workers and management within their work areas. The JSO cards provide data that is used for hazard recognition, problem solving, and continuous improvement. These observations will provide direct measurable information on employee's work practices identifying safe and at-risk behaviors or actions.
"JSO" process	 The following steps indicate the purpose and process of conducting behavior observations: Observe – JSO cards make this step measurable and consistent. Recognize safe behavior – Reinforce safe behaviors. Stop at-risk behavior – Communicate effectively in a non-threatening and encouraging manner. Identify alternate behavior – Work together to establish a safe method. Clarify Safety Commitment – Ensure all involved understand the need for change. Obtain agreement – Ensure those affected proceed as agreed.

• Follow-up – Turn in "JSO" card.



Behavior Based Safety (JSO)		Safety Manual
Employee	The "Stop Work" initiative is designed to:	
involvement	• encourage safety observations and conversations about saf worksite	fety at the
	• allow the identification and correction of unsafe trends in working conditions	behavior or
	As an employee of Gravity Oilfield Services you should:	
	• be confident in your right to work safely	
	• be assured of your rights to call for a "stop work" interven	tion
	Each employee is responsible to work safely and to observe the of co-workers; you are further responsible to:	ne situations
	• stop unsafe work	
	• observe	
	• speak up	
	• intervene by halting unsafe work	
	• complete a "JSO" card	
	Unsafe working conditions can lead to accidents from minor t	o life

Unsafe working conditions can lead to accidents from minor to life threatening. It is not only necessary; it is your responsibility to stop unsafe acts or conditions without fear of reprisal from co-workers, supervisors, or management. It is your responsibility.

GRAVITY

Behavior Based Safety (JSO)

Safety Manual

Observation Feedback

Objective

To communicate and discuss all observations with the observed employee.

Process for providing feedback The observer will:

- review the observation with the observed employee
- start with positive comments
- reinforce safe behaviors first
- describe and discuss what was unsafe
- solicit from the observed employee explanation of his/her unsafe behavior with open-ended questions. During this time the observer shall re-emphasize that there are no consequences for his/her explanation



Safety Manual

Data Collection and Analysis

Objective	To compare measurements and track results of all data and to generate numerical and statistical comparisons that can be made over time. The data will be leveraged and observed into actionable knowledge to reduce injuries.
Data collection	Each yard within the company will:
	 ensure that all employees are aware of and understand the JSO card participate in the observation process and document findings on the JSO card
	• receive submitted cards from any employee daily
	Each Yards HSE coordinator will:
	 collect the received cards, review and sign off with yard management calculate numerical totals from each line item
	• use the information in their assigned areas to address actionable opportunities
	• report the calculations to the Director of Safety
	The Director of Safety will:
	• total up the calculations
	• use the information to address actionable opportunities
	• report the totals to the VP of HSE
Analysis	Corporate safety will:
	 collect data from all areas of the company
	• analyze the data and identify any trends
	• evaluate unsafe behaviors from trend analysis and prioritize



Action Plan

 Objective
 To address unsafe behaviors

 Points of action plan
 Corporate safety will:

 • develop action plan for unsafe behaviors based on comments and feedback from data sheets
 • designate responsible parties and time frames within the action plan

 • define who is responsible for action planning
 • encourage management support

Safety Manual



Safety Manual

Follow Up Action Plan

Objective Gravity Of of a set time

Gravity Oilfield Services' action plans will be carried out over the course of a set time period, depending on the severity of the unsafe observed action. This time period will be up to the discretion of corporate safety. Follow up will be performed to ensure the correction and closure of all actions listed within the Action Plan.

Process

The follow up action plan will include:

- Gravity Oilfield Services will ensure proper maintenance and support of the new process by conducting follow-up observations monthly for the first three (3) months and again at the end of the first six (6) months
- Management and safety personnel will be in charge of the education and skill development as Gravity Oilfield Services continues to implement and further develop additional modules on analyzing data, problem solving and action planning, enhancing participation, and the use of reinforcement.
- All action plans, forms, and anything pertaining to the use, implementation and correction of any and all action plans are archived for seven (7) years for data review and analysis.

As Gravity Oilfield Services compiles, analyzes, and further develops correction plans, the company will continue to move toward 'ZERO' injuries.



Training

Objective	To instruct and train all employees to ensure proficiency and knowledge of the proper observation process for the Behavioral Based Safety Program and the use of the 'JSO' cards as established by Gravity Oilfield Services.
Program orientation	 Yard Management/Supervisors/Safety will hold a meeting to explain the observation process (JSO) to all employees as well as cover in new hire orientation. This is a tool which will measure safe and at-risk behaviors. Job observations shall be documented for both safe and at-risk behaviors so it can be a proactive tool and not a fault finding medium. All employees should be informed of this process so the level of awareness of safe and at-risk behaviors is achieved. Pre-Job Plan: Determine the frequency for completion of the 'JSO' card.

Safety Manual