

POLICY

Hawk Energy, LLC has adopted this Behavior-Based Safety Program for the safety of our employees and help prevent occupational injuries and illness.

The elements of our program consist of:

- Common Goals – Employee and Managerial commitment to the process
- Creating a systematic, ongoing process that defines a set of behaviors that reduce the risk of work-related injury, derived from safety assessments
- Training personnel in the Observation Process
- Observation and data collection on the frequency of critical safety practices
- Feedback and reinforcement to encourage and support positive safety practices
- Action Plan - Team meetings to decide on how to proceed, based on the data
- Review - Monitoring the progress of the Action Plan regularly

OBSERVATION

A critical element in our Behavior-Based Safety (BBS) Program depends on on-site observation. Hawk Energy, LLC will conduct and document direct observations of the affected employee's safe and unsafe acts, providing direct and measurable data. Hawk Energy, LLC ensures that direct and open communication will be maintained with the employees involved and The observer will:

- Meet with the employee at the site and introduce himself and the job being done.
- Observe and monitor the employee, noting his safe behaviors.
- Monitor the At-risk behaviors the employee is putting himself in.

TRAINING

Observation Process Training

Training in the observation process will be established and implemented for the proper personnel. These individuals will be experienced employees of the Company. Training will consist of either classroom or on-the-job training.

Elements of the Training Program Include

- Who is to be trained?
- Ensuring employees know the basic elements of the Behavior-Based Safety program
- Ensuring that all employees involved in the process are trained in the classroom or on the job

The Types of Training that will be Provided Are

- Management training: to ensure the common goals and process of the program are being met
- New employee training: effectively communicating the program to all employees
- Refresher training: to be performed as needed or when changes are made to the policy or procedure of the program

This training will include:

- Program objectives and the metrics used to evaluate the effectiveness of the BBS program
- Incident report reviews
- Conducting on-site observations
- The observer's knowledge of the job procedures they observe
- Knowledge of the correct work and safety procedures involved
- Process on how to complete the observation form
- Determining, analyzing and the meaning behind at-risk behaviors
- Providing feedback training and role play (mentoring and coaching)
- Informing employees, they may be observed at any time

This training process will be documented to keep on record those qualified to observe on-site behaviors and effectively implement the program's elements.

FEEDBACK

Communication is a crucial element in a successful Behavior-Based Safety program. To effectively accomplish this, feedback is of key importance.

The observer will start by commending the safe behavior the employee was doing during his work. You then want to explain, one by one, the At-risk behaviors the employee was doing. Then the observer asks the employee why he was putting himself at risk. For example, if the employee is welding a piece of metal and the sparks are flying in the employee's direction. The observer would then ask the employee why he was not wearing protective clothing, like a flame-retardant apron.

At this time, the observer and employee will discuss the at-risk behaviors until the employee agrees to try the suggested recommendation made by the observer. The employee might be aware of his at-risk behavior or maybe not. The employee may be doing the at-risk behavior for a long time.

The Observer's job here is to highlight this behavior and then explain the associated negative consequences of this behavior. The above discussion and agreement are the individual feedback that helps the employee to change his behavior. This feedback is considered as a form of reward since:

- The employee got commendable comments on his safe behavior.
- The employee understood his at-risk behavior without being reprimanded at the site or reported to his superiors for further penalties.

Key Elements for the Observer to Remember During the Feedback Process

- Review the observation with the employee.
- Start with positive comments on behavior and procedure.
- Reinforce safe behaviors observed.
- Detail and discuss the unsafe behaviors observed and the consequences.
- Gain feedback from the affected employee on the observed unsafe behavior.
- Determine the reasons for the unsafe actions with open-ended questions to the employee.
- Reemphasize that there are no negative consequences at this stage, so long as the observer and employee agree on the change of behavior through corrective actions.

DATA COLLECTION

At the end of the observation, the observer will:

- Fill out an Observation Form with the safe and at-risk behaviors he noticed.
- Record the date, time and location of the observations.
- Note the employee comments and reasons for the at-risk behavior.
- Record recommended safe behavior.

The Observation Form does not note the employee's name or identification number.

- These Company forms will be used by Hawk Energy, LLC to summarize the observation process. Recording this interaction is important for later detailed analysis by the committee in charge of the program.
- Data and the Observation Form will be gathered and entered into an electronic database. Reports will be generated for the committee to analyze at-risk behavior trends.
- Using the data collected through the BBS program and the areas of improvement, Hawk Energy, LLC will institute a continuous improvement process.
- Once areas of improvement are identified using the data collected through the BBS program, Hawk Energy, LLC will institute a continuous improvement process.
- Information taken from the observation and feedback phase of the program will be compiled into useful data and implemented in the action plan.
- Institute a continuous improvement process once areas of improvement are identified in the data collected through the company's Behavior-Based Safety (BBS) program.

ELEMENTS OF THE ACTION PLAN

To address unsafe behaviors Hawk Energy, LLC will construct its Action Plan based on Observation Reports, trend analysis and recommendations from the observers and employees. David Slim is responsible for the procedures of the Action Plan.

Action Planning will Include

- Regularly scheduled meetings to analyze Behavior-Based Safety report findings
- Evaluating unsafe behaviors
- Designating responsible parties and time frames to complete the Action Plan
- Ensuring support of management

The Committee will

- Produce a set of recommendations to correct employees' behavior.
- Recommendations may be as simple as providing Personal Protective Equipment (PPE) to employees in a certain location or increasing the workforce in another location.
- Some of the recommendations require site modification or costly machinery. Such recommendations are sent to top management for necessary approvals.

The Committee's responsibility is to ensure that recommendations will

- Change the at-risk behaviors at the targeted location.
- Eliminate hazards and risks caused by hardware or wrong design.

FOLLOW-UP

Any Action Plans set out by Hawk Energy, LLC at the direction of David Slim will be completed in a time frame agreed upon by the entire committee.

Regularly scheduled meetings will be held to:

- Assign responsibility for the completion of the Action Plan.
- Ensure that the guidelines of the Action Plan are being carried out.
- To document the Action Plan and its progress.

**Behavior-Based Safety Program
Employee Training Form**

I, _____, have read or been informed of the Behavior-Based Safety Program and its elements.

- I am aware of the Company's Safe Work procedures including the Company's Code of Safety Practices.
- I understand I may be observed in my job performance or assigned task by a designated Observer and this person will inform me that I am being observed.
- I understand that the Observer will communicate to me the positive and At-risk behaviors I may display on completion of his/her observation.
- I agree to do my utmost to implement any of the Observers' recommendations they make to improve my performance safely.
- I understand my cooperation and communication are key to the success of the Behavior-Based Safety program.
- I understand that the observations of my job performance will not include my name or identifying mark and are used only for statistical information in the program.
- I agree to follow the procedures of any Action Plan as set out by the Company.

Employee Print

Signature

Date

Observation Form

Observer Name:	Date:
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Job Being Observed:

Job Step	Procedure Comments
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	Positive Behaviors	At-risk Behaviors
1		

Recommendations:

Job Step	Procedure Comments
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	Positive Behaviors	At-risk Behaviors
2		

Recommendations:

Job Step	Procedure Comments
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	Positive Behaviors	At-risk Behaviors
3		

Recommendations:

Job Step	Procedure Comments
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	Positive Behaviors	At-risk Behaviors
4		

Recommendations:

Employee Comments:

Observers Signature: _____ Date: _____

