



North America Business Program – Environmental, Health and Safety (EHS) Department

Action Based Safety Program

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EHS Mosaic – North America Action Based Safety Program

1 PURPOSE

The purpose of this program is to support the health and safety of employees and contractors by identifying safe and at-risk activities and situations through peer-to-peer observations.

2 SCOPE

This program applies to all operating sites in the North America Business and North America Supply Chain.

3 APPENDICES

The following appendices are associated with this Program:


| Appendix | Appendix Title |
|----------|----------------------------|
| A | High Energy Hazards |
| B | Site Recognition Guideline |

4 GENERAL REQUIREMENTS

- 4.1 All sites shall implement and maintain an Action Based Safety (ABS) observation process as part of their site health and safety initiatives.
- 4.2 Each site shall have an ABS team that includes:
 - 4.2.1 An ABS Facilitator, with dedicated time specified for ABS activities and leading the committee,
 - 4.2.2 An ABS Steering Committee, which must include hourly employees,
 - 4.2.3 An ABS Champion (Sponsor), Superintendent level or higher (either a formal position or informal management representation), and
 - 4.2.4 As a best practice, a Barrier Removal Team (comprised of staff that have the ability and influence to implement action items) to assist with addressing action items that arise from observations. In the absence of a formal Barrier Removal Team, site leadership will provide dedicated resources to implement any required action items
- 4.3 The duration of ABS team positions shall be determined by the site. Sustainment and growth of the site's process must be considered before rotating positions.
- 4.4 ABS Steering Committees shall meet monthly.
- 4.5 ABS observation data will be compiled and reviewed by the committee. Resulting information will then be communicated to site employees (as a newsletter, toolbox talk, or part of another monthly site communication), and to site leadership to inform them of identified trends and opportunities.
- 4.6 The ABS committee will initiate identified action items and track their progress according to the site's chosen method, collaborating with site leadership as required to implement potential solutions to any identified at-risk activities and situations.

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- 4.7 Each site is encouraged to brand their ABS observation process in order to promote and enhance ABS visibility and engagement; branding includes a unique name and logo.
- 4.8 Each site shall have a process in place to recognize quality observations that promote safe work practices and activities (see Section 8).
- 4.9 Observations shall include both human factor and hazard exposure elements:
 - Actions – human actions and influences on their actions while conducting the task
 - Situations – area conditions that may impact a person while conducting a task
 - High energy hazards – hazards in the area with high energy potential that, without appropriate controls, could cause serious harm to the person doing the task (see Appendix A)
- 4.10 Identifying information obtained through observations shall remain confidential and protected as deemed appropriate. That is, the information shall not be used for disciplinary or discriminatory purposes, but can be used for recognition and reward purposes.
- 4.11 Observations can be either formal or informal:
 - Formal observations are those that are conducted with intention, informing the observed party in advance that an ABS observation is being performed.
 - Informal observations are those that happen during the normal course of duties but are not planned for. For example, observing an employee working too close to an unbarricaded drop zone while driving by on the way to a different work area.

 Note: In either case, the observer must intervene if the observed person(s) is at risk and feedback must be provided to the observed person(s).
- 4.12 If a person is found to be at-risk during the course of an observation, work shall be stopped and measures taken to mitigate the risk. The measures shall be taken constructively and without discipline, and the observation will be entered for learning and tracking purposes while maintaining the confidentiality of the person(s) involved.

5 ROLES AND RESPONSIBILITIES

The following table contains a list of personnel that hold responsibilities within the program:

| Position | Responsibilities |
|-----------------|--|
| BU Leadership | <ul style="list-style-type: none">• Support the sites in implementation and sustainment of their ABS process• Ensure that sites have an ABS process in place |
| Site Leadership | <ul style="list-style-type: none">• Ensure that sites have an ABS process in place and provide support for process elements• Provide resources (eg. budget and manpower) for ABS implementation, recognition, and sustainment |

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| | <ul style="list-style-type: none"> • Allow time for participation in ABS activities (eg. monthly meetings, observations) • Review ABS data/recommendations provided by the committee • Address any identified action items that are required to reduce risk to personnel • Communicate with the committee on action item status and other relevant operational updates |
| <p style="text-align: center;">NA Action Based Safety Lead</p> | <ul style="list-style-type: none"> • Act as liaison between site ABS teams, site leadership, and NAB EHS and Operations • Provide support and guidance to site ABS teams • Support the administration of required technology platforms • Oversee ABS process development and sustainment • Monitor ABS data to identify trends that indicate elevated risk and/or provide opportunities for improvements • Coordinate ABS-related conference attendance |
| <p style="text-align: center;">ABS Facilitator (Site)</p> | <ul style="list-style-type: none"> • Schedule and attend monthly ABS meetings • Compile and review observations and metrics • Report monthly metrics/data and trends to NA ABS Lead and site leadership • Develop site communications with support from the committee • Coordinate ABS training and recognition resources • Promote ABS activities with site employees • Maintain field presence to offer coaching and assistance as required • Assist with feedback and action item follow up resulting from observations • Maintain confidentiality of observers with the exception of providing recognition to employee(s) |
| <p style="text-align: center;">ABS Committee (Site)</p> | <ul style="list-style-type: none"> • Attend and actively participate in monthly meetings • Review observations and metrics |

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| | <ul style="list-style-type: none"> • Assist ABS Facilitator with development of communications and action item recommendations • Promote ABS activities with site employees in the field • Provide observation coaching and assistance when required • Assist with feedback and action item follow up resulting from observations • Maintain confidentiality of observers with the exception of providing recognition to employee(s) |
| <p>ABS Champion (Sponsor) (In the absence of a formal Champion, responsibilities revert directly to site leadership)</p> | <ul style="list-style-type: none"> • Attend monthly ABS Committee meetings (as a best practice) • Act as liaison between the ABS Committee and site leadership in order to promote ABS and sustain feedback loops • Provide resources and support to the ABS Committee for any action items requiring follow-up and/or that need to be escalated beyond their scope of control • Provide resources and support for ABS recognition |
| <p>Site Employees</p> | <ul style="list-style-type: none"> • Participate in the ABS process at the site by: <ul style="list-style-type: none"> ○ engaging in conversations with and conducting observations with peers ○ identifying safe and at-risk activities and situations as a proactive measure to prevent harm |
| <p>Barrier Removal Team (In the absence of a Barrier Removal Team, responsibilities revert directly to site leadership)</p> | <ul style="list-style-type: none"> • Support the committee by determining solutions to actionable observations • Assign and implement action items beyond the scope of the ABS Committee |

6 DEFINITIONS / REFERENCE INFORMATION

| Term | Definition |
|---------------------------|---|
| Action Based Safety (ABS) | A process whereby peer-to-peer observations are used to identify safe and at-risk activities and situations in order to promote safe work practices and, when necessary, to intervene in order to prevent harm. |

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| High Energy Hazard | A hazard that is most likely to cause a serious injury or fatality if an uncontrolled release of energy results in contact between a person and that hazard. See Appendix A for additional information. |
| Quality Observation | <p>An observation that involves a discussion and/or action that removes or reduces the risk of harm to a person, or reinforces safe work activities. Communication must take place between the observer and the observed party in order to be considered a quality observation.</p> <p>Types of quality observations include:</p> <ul style="list-style-type: none">• Observing a person(s) working safely who has all effective controls in place to protect themselves and others from harm, and providing positive feedback to them to acknowledge their safe actions.• A discussion with a person about, and/or assistance with, an observed action or situation resulting in an immediate reduction/removal of the risk of harm.<ul style="list-style-type: none">○ Examples include assisting with an awkward lift, removing a WWS hazard, or adding a control for a high energy hazard such as a safe work zone.• A discussion with an observed person about a situation present in the work area during the task that requires a longer term solution or improvement which will provide ongoing reduction or removal of risk.<ul style="list-style-type: none">○ These are items that typically require a work order or are submitted as a risk reduction project. |

7 REPORTING AND METRICS

7.1 Sites must use a platform for observations that will allow the ability to view the observations and the compilation of metrics, such as the Intelex ABS Module (web and mobile) or MS Forms.

7.2 Metrics

7.2.1 Metrics shall be established to support continuous improvement of the action based safety process. ABS metrics will be compiled monthly, examples of which may include:

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- Number of observers and people observed, and observations completed
- Quality Observation rate
- Leading Safe and At Risk factors and trends
- Intervention / prevention data

7.3 Trends shall be identified from site metrics and used by the site committees to:

7.3.1 Provide recommendations for targeted improvements

7.3.2 Recognize safe work and areas of excellence

7.4 Reports and recommendations shall be provided to site leadership on a monthly basis.

7.5 Metric and trend information will be included with monthly site communications as a feedback loop for employees.

8 RECOGNITION

8.1 Sites shall have a recognition system in place for quality ABS observations and safe work activities.

8.2 Sites are encouraged to be creative with their recognition system, incorporating elements as outlined in the Recognition Guideline in Appendix B. Note that all elements of the guideline are not required and that the intention is to have reasonable equity across sites.

8.3 Site leadership shall provide the resources for the Site Steering Committee to manage ABS recognition.

8.4 The site ABS Facilitator and Committee will manage the selection, distribution, and communication of ABS recognition, and will report back to site leadership.

8.5 BU level recognition initiatives will be incorporated where applicable.

9 TRAINING

9.1 The following table outlines the training required for Action Based Safety:

| Audience | Training Elements / Topics | Frequency | Method |
|--|---|-----------|-------------------------------|
| ABS Observers at operating sites | ABS Overview <ul style="list-style-type: none"> • Purpose of observations • How to conduct an observation • Site specific information (eg. committee, recognition) | Initial | Instructor Led Training (ILT) |
| ABS Facilitator / ABS Steering Committee | ABS Overview, expectations of Facilitator/Steering Committee | Initial | ILT |

9.2 Employees shall receive additional training (or retraining) if requirements are changed or updated.

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9.3 Training records shall be maintained as per *Mosaic Document and Record Control* policy.

10 SELF-ASSESSMENTS

10.1 Site self-assessment shall be conducted in accordance with the MMS requirements.

11 PROGRAM REVIEW

11.1 North America ABS team will review this program every 7 years and update as required.

12 RECORD RETENTION

12.1 Refer to the *Mosaic Document and Record Control* policy for record retention requirements.

13 REFERENCES

| References |
|---|
| Journal of Organizational Behavior Management |
| DEKRA |
| Energy-Based Safety (Safety Function) |

14 REVISION LOG

| Rev. No. | Rev. Date | Revised By | Reason for Revision |
|----------|------------------|-------------------|----------------------|
| 0 | 15 October 2021 | Health and Safety | Initial release |
| 1 | 14 November 2023 | Health and Safety | Program name change |
| 2 | 19 May 2026 | Health and Safety | Updated requirements |