

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 set common expectations for existing Action Based Safety (ABS) Processes and to be used for development of new ABS processes within the North America Business and North America Supply Chain to ensure consistency and alignment.

2 SCOPE

This program applies to the North America Business and North America Supply Chain.

3 APPENDICES

There are no Appendices associated with this Program however, there is one reference document (see Reference A, section 11).

4 GENERAL REQUIREMENTS

4.1 Every site covered by this Program shall develop and maintain an active ABS process. If there are barriers that cannot be overcome, then a Variance shall be requested and approved by the Operations VP.

4.2 Creating a ABS Process

4.2.1 The follow steps provide a guide to implementing a sustainable process:

- 1) Secure buy in and commit to the process to help reduce injuries and develop safe behaviors.
- 2) Collect and review baseline data.
- 3) Create an observation checklist.
- 4) Conduct Observations.
- 5) Give feedback (respectful and non-confrontational).
- 6) Use the data and the barrier removal team to make positive change by eliminating at risk behaviors and promoting safe behaviors.
- 7) Measure success and continuously improve.

5 GENERAL RESPONSIBILITIES BY ROLE

5.1 NAB Leadership

5.1.1 Set the expectation that a Action Based Safety Process is critical to achieve a zero-injury workplace. Prioritize and support the time commitment, to all involved, to ensure the success of the process. Stress the importance and support the premise of “no name, no blame.”

5.2 Site Leadership

5.2.1 Clearly establish that this is an employee driven, leadership supported process. It is essential for Leadership to support the process, promote it, and provide adequate time for the employees to take part.

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5.3 All employees

- 5.3.1 Support an action-based safety process that follows the Behavioral, Accident, Prevention, Process (BAPP) model which follows the key concepts of identifying critical behaviors, gathering data, providing feedback and using data to remove barriers or the SafeStart program, which focuses on states that lead to critical errors.
- 5.3.2 Understand and accept the observation process is “no name, no blame” and that participating in the observation process as either the observer or worker being observed, is equally important.

5.4 ABS Team Members

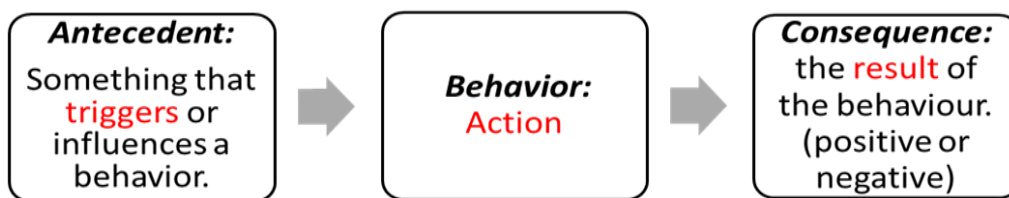
- 5.4.1 ABS team members will be respectful and dedicated to the ABS process, led by example and ultimately work together to promote safe work environments and habits.

6 ELEMENTS OF AN ABS PROGRAM

6.1 The ultimate goal of an ABS Program and Process is to make safe behaviors a habit. This occurs when positive feedback and recognition of safe behaviors are used to create a culture where risk behaviors are replaced with safe behaviors.

6.2 The ABC Model

- 6.2.1 All participants of a successful ABS program must understand behavior as explained in the Antecedent, Behavior, and Consequence (ABC) model. The model is explained below:
 - Antecedent is the stimulus that immediately proceeds the behavior, and it can have a positive or negative impact on your behavior.
 - Behavior is the action you take.
 - Consequence is the result of your behavior; this can be positive or negative.



6.3 The Behavioral Accident Prevention Process (BAPP)

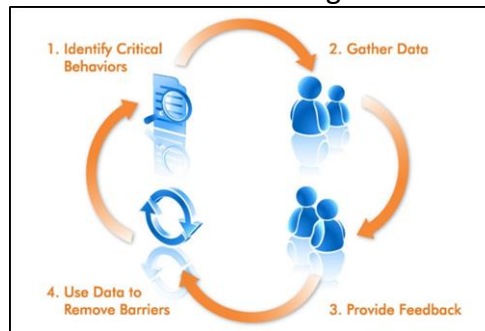
- 6.3.1 There are four (4) fundamental Elements for the BAPP Process. Much like the fire triangle with oxygen, heat and fuel as necessary ingredients to create a fire, the same applies to a successful ABS process. The following 4 fundamental elements are required for the BAPP process:

 **Note:** Failure of one of the elements will greatly impact the success.

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1. Identify Critical Behaviors - Through the peer to peer observation process, quality observations and positive feedback. If an at-risk behavior was identified, having a professional, respectful conversation around why the behavior occurred. The observers are not “safety cops” they are coworkers that care about each other's safety.
2. Gather Data - Teams must stress the importance of accurate data, pencil whipped/poorly done observations can negatively affect the valuable leading indicators. During an observation, check the applicable boxes. There is no need to fill out every box; only those that apply to the observation. Data must remain anonymous.
3. Provide Feedback - Understanding the consequences of an individual's at-risk behaviors can impact their behavior long term. Recognizing and commending coworkers on a job well done will have a positive impact on future safe behaviors. Ask the employee being observed what would make the job safer. The two-way communication is vital to uncovering potential exposure issues that may be present.
4. Use Data to Remove Barriers - A Barrier Removal team is imperative to overall success of the process. Ensure that there is a broad range of employees, including management sponsors to ensure a proactive solution can be implemented as required.

BAPP Process diagram:



6.4 Detailed Responsibilities by Role

6.4.1 General Manager/Manager sponsor/barrier removal team responsibilities:

1. Assist the facilitator and steering team to obtain necessary resources.
2. Serve as a liaison between management, the facilitator and steering team.
3. Fully support time commitments to ensure the success of the process.

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4. Manager sponsor and barrier removal team should meet monthly to review metrics for leading indicators and address any corrective actions identified.
5. Site will report metrics to the BU monthly.

6.4.2 Facilitator Responsibilities:

1. Maintain a positive attitude and provide positive recognition to everyone involved.
2. Ensure confidentiality throughout the process.
3. Coordinate steering team training and resources.
4. Generate reports for metrics, leading indicators, identify the highest risk areas, highlight successes and report out to the General Manager monthly.
5. Oversee the process and work with management sponsor / barrier removal team to implement potential solutions for highest risk areas.
6. Be visible in the field, coaching, performing observations and addressing any concerns.

6.4.3 Steering team responsibilities:

1. Set a good example of safe work habits, follow policies and procedures.
2. Ensure confidentiality throughout the process.
3. Attend all the required meetings.
4. Assist in action planning for positive improvements.
5. Perform observation and in the field coaching and training as required.

6.4.4 Employee responsibilities:

1. Be open to and accepting of the employee driven process.
2. Be willing to perform observations or be observed.
3. Be committed to yourself and your co-worker's safety.
4. Have discussions about safety with your co-workers with no repercussions or discipline.

6.5 Site Implementation practices

- 6.5.1 Site Management shall define and communicate appropriate roles and the intent of the Action Based Safety Process.

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- 6.5.2 Each site shall select a facilitator and the steering team. The selection must include input from both the employees (union if applicable) and the leadership team in order to select the most appropriate individuals.
- 6.5.3 Management shall provide clear communication to the work force on the intent, the roll out, and the people involved with the program.
- 6.5.4 Leadership, the Facilitator and the steering team shall be trained in the ABS process followed by training for all employees on site.
- 6.5.5 The Facilitator and steering team shall review incidents and near misses, and perform observations. The resulting information is to remain anonymous with only the Facilitator and their steering team having access.
- 6.5.6 Original observations serve as a baseline for the measuring improvements in different areas. An example is: if “in the line of fire” is most at risk, then the Facilitator and steering team should approach leadership to discuss potential corrective actions (i.e. different tools, new or different training, better PPE, etc.) and how they can be implemented.
- 6.5.7 Identify behaviors, recognize and appreciate safe behaviors, and identify at risk behaviors and conditions that would be target areas to improve.
- 6.5.8 Create a monthly report that remains anonymous and recognizes: 1) safe behaviors, 2) at risk behaviors, 3) areas that could be a leading indicator and, 4) areas where extra support/observations are required. This report shall be reviewed by leadership to implement potential solutions to reduce the risk as well to recognize safe behaviors.
- 6.5.9 Every six months conduct a survey assessment for feedback from the employees. The Facilitator, steering team, and leadership shall review survey feedback to ensure the process is working, and if not, determine what needs to be improved.




Note: *It is crucial to encourage feedback to keep participants engaged and eliminate the process from becoming stale.*

6.6 Team Branding

- 6.6.1 The program encourages each site to adopt their “brand name” for the BAPP program. As early as possible, the team should decide on what they will call the BAPP implementation at their facility. The name should be meaningful to the people who work there. As an example, the facility name may be included, or names could be an acronym: **Bartow** (**B**artow **A**ssesses **R**isk **T**hrough **O**bserving **W**orkforce) or **SABER** (**S**afe **A**ttitude **B**ecomes **E**veryone’s **R**esponsibility). In addition to a name, the team may want to develop a logo, a visual symbol for the process that can be used on data sheets, stickers, flags, newsletters, etc.

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 **Note:** Consider having a contest for a name and/or logo. The contest is another good way to communicate the process to the site. It also provides more opportunity to participate and provide input.

6.7 Metrics

6.7.1 It is important that metrics be established in order to monitor the continuous improvement and health of the action based safety process. Each of the metrics below will be monitored and reported to the facility General Manager on a monthly basis.

- Number of trained observers
- Number of active observers
- Number of newly trained observers
- Number of observations completed
- Percentage of employees participating in the program (observations and employees observed)
- Barrier removal team corrective actions/successes

6.7.2 Metrics automated – As technology improvements and spreads throughout the business, metrics gathering and reporting will be automated with dashboards housed in new IT systems (i.e. Intelex, MIC (Mosaic Information Center, or other).

7 TRAINING

7.1 Training

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

| Audience | Training Elements / Topics | Frequency | Method |
|--------------------------------|---|-----------|-------------------------------|
| Management | ABS/BAPP Process | Initial | Instructor Led Training (ILT) |
| Supervisors | ABS/BAPP Process | Initial | ILT |
| Facilitator/Steering committee | ABS/BAPP Process, Facilitator training, Steering Committee training, Communication, and presentation training | Initial | ILT |
| Employees | Site specific ABS process | Initial | ILT |
| As required | Annual ABS conference/Program updates | Annually | ILT |

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7.2 Retraining

7.2.1 In addition, an employee shall receive additional training (or retraining) if any of the following conditions exist:

- Program requirements change;
- Changes in the workplace render previous training obsolete;
- Inadequacies in the employee's knowledge is of concern

7.3 Training records

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



Reference: Mosaic Document and Record Control policy

8 SELF-ASSESSMENTS

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



Note: Recommend any changes to the Program EHSS Project Management Office (PMO) via the PMO Change Request form.

9 PROGRAM REVIEW

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

10 RECORD RETENTION

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



Reference: Mosaic Document and Record Control policy

11 REFERENCES

| References (Number and title) |
|---|
| Reference A – “ABS Guide” Link: (https://doculink.mosaicco.com/livelink/llisapi.dll?func=ll&objId=112700225&objAction=browse&viewType=1) |
| DEKRA (Former Behavior Science Technology safety company) |
| BAPP (Behavioral, accident, prevention, process) |
| BBS (Behavior Based Safety) |
| BST (Behavioral Science Technology) |
| Mosaic Document and Record Control Policy |

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| References (Number and title) |
|-------------------------------|
| SafeStart |

12 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 |