


|   |   |                |
|---|---|----------------|
|  | <b>Berry Bros. General Contractors, Inc.</b><br><b>Corporate Policy Procedure</b><br><br><b>(HSE) Health, Safety &amp; Environmental</b><br><b>Policies and Procedures Manual</b> |                |
| Issue Date: 11-10-2014  |   | Section # 40   |
| Page: 1 of 6  |   | Doc # SWP - 40 |
| Approver: Joe Berry   |   | Revision: 1    |
| <b>HS&amp;E COMMUNICATIONS</b>  |   |                |


| CONTENTS                                | SUBPARTS          |
|---|-------------------|
| <b>PURPOSE</b>                          | <b>A</b>          |
| <b>SCOPE</b>                            | <b>B</b>          |
| <b>RESPONSIBILITIES</b>                 | <b>C</b>          |
| <b>HS&amp;COMMUNICATION PROCESS</b>     | <b>D</b>          |
| <b>EXTERNAL HS&amp;E COMMUNICATIONS</b> | <b>E</b>          |
| <b>TRAINING</b>                         | <b>F</b>          |
| <b>DEFINITIONS</b>                      | <b>G</b>          |
| <b>OPEN DOOR POLICY</b>                 | <b>Appendix A</b> |

### **SUBPART A - PURPOSE**

To effectively manage internal and external HS&E communications throughout the various Berry Bros. General Contractors, Inc. divisions and business units.

### **SUBPART B - SCOPE**

This procedure applies to all BBGCI employees, locations, operations, and projects and provides for appropriate procedures and processes that will ensure the effective flow of HS&E information across all divisions and business units.

|   |   |                |
|---|---|----------------|
|  | <b>Berry Bros. General Contractors, Inc.<br/>Corporate Policy Procedure</b><br><br><b>(HSE) Health, Safety &amp; Environmental<br/>Policies and Procedures Manual</b> |                |
| Issue Date: 11-10-2014  |   | Section # 40   |
| Page: 2 of 6  |   | Doc # SWP - 40 |
| Approver: Joe Berry   |   | Revision: 1    |
| <b>HS&amp;E COMMUNICATIONS</b>  |   |                |

## **SUBPART C - RESPONSIBILITIES**

### **Corporate HS&E / Risk Management Coordinator**


- Ensures that pertinent HS&E information is communicated to and from all divisions, business units, employees, clients, sub-contractors, and other interested parties.
- Evaluates and responds to employee feedback concerning HS&E concerns and or suggestions in support of continuous improvement of the HS&E program.

### **Project Managers and Supervisors**

- Facilitates HS&E communication processes such as employee HS&E meetings, daily toolbox meetings, personal employee conversations, hazard alerts, incident reports, etc.
- Encourages employees to participate in the HS&E program and provide input into the HS&E communication processes.
- Responds to employee HS&E questions, concerns or suggestions in a timely manner.
- Provides feedback concerning employee HS&E concerns or questions to the HS&E Manager/Coordinator as appropriate to support continuous improvement of the HS&E program.

### **Employees**

- Actively participate in the HS&E communication processes and provide input for continuous improvement of the BBGCI HS&E program.

|   |   |                |
|---|---|----------------|
|  | <b>Berry Bros. General Contractors, Inc.<br/>Corporate Policy Procedure</b><br><br><b>(HSE) Health, Safety &amp; Environmental<br/>Policies and Procedures Manual</b> |                |
| Issue Date: 11-10-2014  |   | Section # 40   |
| Page: 3 of 6  |   | Doc # SWP - 40 |
| Approver: Joe Berry   |   | Revision: 1    |
| <b>HS&amp;E COMMUNICATIONS</b>  |   |                |

## **SUBPART D - HS&E COMMUNICATION PROCESSES**

One-on-one conversations, employee HS&E meetings, daily toolbox meetings, worksite walkthroughs, and observations are just a few of the communication opportunities routinely used by BBGCI. Additional methods used to facilitate communications among all BBGCI employees, clients, and subcontractors include:


**Open Door Policy:** It is preferred that the immediate supervisor and/or project manager be consulted for resolution of HS&E concerns; however, BBGCI maintains an open door policy for employees to report problems or concerns to any level of management without fear of reprisal or retaliation. (See appendix A)

**Policy Statement:** BBGCI's HS&E policy statement defines and communicates the overall goals, objectives, and processes used to guide the HS&E program. It is posted at all projects and facilities.

**Performance Metrics:** HS&E performance metrics, both leading and lagging indicators, shall be maintained and communicated to employees, clients, and sub-contractors to facilitate continuous improvement and enhance accountability for meeting BBGCI's HS&E goals and objectives.

**Orientation and Training:** Essential HS&E information shall be communicated to employees and sub-contractors through BBGCI's new employee and project-specific HS&E orientation and training programs.

**Hazard and Risk Assessments:** Hazard and risk assessment information shall be communicated to employees and sub-contractors through the project hazard analysis and Job Safety and Environmental Analysis (JSEA/JSA) processes.

|   |   |                |
|---|---|----------------|
|  | <b>Berry Bros. General Contractors, Inc.<br/>Corporate Policy Procedure</b><br><br><b>(HSE) Health, Safety &amp; Environmental<br/>Policies and Procedures Manual</b> |                |
| Issue Date: 11-10-2014  |   | Section # 40   |
| Page: 4 of 6  |   | Doc # SWP - 40 |
| Approver: Joe Berry   |   | Revision: 1    |
| <b>HS&amp;E COMMUNICATIONS</b>  |   |                |

**Policies and Procedures:** Specific implementation guidance and requirements shall be developed and communicated to employees and sub-contractors through BBGCI's policies and procedures, and programs.

**Incident Investigation Reports and Corrective Actions:** Incident / accident investigations provide very valuable lessons learned following injuries, fires, spills, near misses, etc. Investigation reports, corrective action status reports, incident trending reports all can provide employees, supervisors, and managers with the necessary information for incident/accident prevention and hazard control.

**Notices, Posters, & Multimedia:** Posted HS&E notices such as OSHA, Insurance, Workers Compensation, HS&E Policies, multimedia presentations, etc. are provided to maintain a proactive safety culture at all projects and facilities where possible.


**Behavior Based Safety Program:** Employees may report any suggestions, unsafe condition, unsafe act, or performance anonymously via this process if they so choose.

**HS&E Alerts:** This tool communicates lessons learned from incident/accident investigations and are posted on employee bulletin boards where applicable, transmitted by e-mail, and discussed at employee HS&E Safety meetings.

## **SUBPART E - EXTERNAL HS&E COMMUNICATIONS**

All communications with HS&E regulatory agencies shall be conducted by BBGCI's Cooperate HS&E / Risk Management Department and applicable project managers, and approved by the President of BBGCI.

All routine HS&E related communications with clients shall be conducted by the designated Field Safety Coordinators, Supervisors/Superintendents, and Project

|   |   |                |
|---|---|----------------|
|  | <b>Berry Bros. General Contractors, Inc.<br/>Corporate Policy Procedure</b><br><br><b>(HSE) Health, Safety &amp; Environmental<br/>Policies and Procedures Manual</b> |                |
| Issue Date: 11-10-2014  |   | Section # 40   |
| Page: 5 of 6  |   | Doc # SWP - 40 |
| Approver: Joe Berry   |   | Revision: 1    |
| <b>HS&amp;E COMMUNICATIONS</b>  |   |                |

Managers. Other material coming in from other sources shall be reviewed and approved by the Corporate HS&E / Risk Management Departments before disbursement.

### **SUBPART F - TRAINING**

BBGCI will review the HS&E Communication procedure during new employee orientation and periodically thereafter through safety meetings. All training will be documented and made available to the client, government agencies or as required by law.

### **SUBPART G - DEFINITIONS**

**Internal HS&E Communications:** Refers to HS&E related leaflets, pamphlets, newsletters, posters, signs, bulletin board notifications, policies, procedures, programs, reports, training materials, etc.


**External HS&E Communications:** Refers to regulatory or client HS&E related communications such as regulatory inspections, requests for information, bid proposals, audits, investigations, etc. It does not include the sharing of internal HS&E communications with clients and/or sub-contractors.

Revision Date: 4/30/14

\_\_\_\_\_

Approved By: Joe Berry & Safety Committee

\_\_\_\_\_

|   |   |                |
|---|---|----------------|
|  | <b>Berry Bros. General Contractors, Inc.<br/>Corporate Policy Procedure</b><br><br><b>(HSE) Health, Safety &amp; Environmental<br/>Policies and Procedures Manual</b> |                |
| Issue Date: 11-10-2014  |   | Section # 40   |
| Page: 6 of 6  |   | Doc # SWP - 40 |
| Approver: Joe Berry   |   | Revision: 1    |
| <b>HS&amp;E COMMUNICATIONS</b>  |   |                |

**Appendix A**

**TO:** All BBGCI Employees

**RE:** **Open Door Policy**

Date: April 15, 2014

We encourage open communication between all employees within BBGCI and with our Owner/Client management teams, regardless of the forum. The weekly toolbox meetings, the weekly safety meetings, and the daily or weekly management meetings are the venue for employees to voice their concerns, suggestions, or recommendations without fear of reprisal or retaliation or consequence.

We want to assure every employee that neither BBGCI nor our Clients would view any such suggestions as criticism. We believe that open discussions prompt another look at a situation or event that could result in positive changes to the work environment. In fact, we encourage open dialog and welcome any such recommendations and or comments to assist both BBGCI and our Clients to better prepare for moving forward safely, effectively, and efficiently.

Please be advised that we strongly encourage and expect every employee to be proactive in raising any issue of concern, regardless of its nature, without fear of retribution from anyone with BBGCI. We will consider and evaluate all concerns focusing on contractual and regulatory perspectives first, as well as management practices. Recommendations from this process will be evaluated through appropriate owner/client management levels and the resulting path forward will be communicated to all affected personnel.

\_\_\_\_\_  
President

\_\_\_\_\_  
HS&E / Risk Management Director

\_\_\_\_\_  
Vice – President

\_\_\_\_\_  
Date