

TO: All Team Members
FROM: Patrick Sughrue
DATE: June 2, 2025
SUBJECT: Life Saving Absolutes

The health and safety of every individual team member is our moral responsibility. To reinforce this commitment, over the last several months, each of our individual business unit/market leaders and their respective safety directors have worked collaboratively to align our Life Saving Absolutes across the entire company.

As a result of their hard work, we are proud to officially launch our newly aligned **Life Saving Absolutes**—a set of non-negotiable safety expectations that are essential to protecting lives on every project.

These Life Saving Absolutes represent behaviors and practices that must be followed without exception and will be effective as of **July 1, 2025**. They have been developed based on industry's best practices, lessons learned, and our own experiences and values. When we fail to follow these absolutes below, it places us at serious risk and can have life altering or life ending consequences.

The new Life Saving Absolutes include:

1. Elevated Work
2. Energy
3. Distracted Driving
4. Equipment Operation
5. Confined Space
6. Gravity
7. Excavation

These absolutes are not guidelines—they are expectations that apply regardless of your position or tenure with the company. We are counting on each of you to take personal responsibility for your safety and the safety of those around you.

In the coming days, your supervisors and/or safety professionals will provide additional details, review each absolute with you, and answer any questions you may have. We will also be integrating these absolutes into our orientations and educational programs.

Together, we can create a work environment where everyone goes home in better condition than which they arrive at work in. Please continue looking out for one another and doing what is right, even when no one is watching.

Sincerely, Pat Sughrue

Life Saving Absolutes

Life Saving Absolutes are High Energy Hazards that, if not identified or mitigated, can expose us to serious risks with potentially life-altering or fatal consequences.



ELEVATED WORK

Working where a human fall hazard exists and not protecting or securing one from falling.
Working outside the company, client, manufacturer, federal, state, or local requirements.



ENERGY

Working without all sources of energy systems identified and controlled (live or stored).
(Example: Electricity, Gas, Chemical, Fluid Power, Air, Water, Steam, Radiation, Fire, Traffic etc.)



DISTRACTED DRIVING

Any activity while operating a vehicle without having a minimum of one hand on the wheel and eyes on the road. Using a mobile device and/or a device's applications or features other than hands free.



EQUIPMENT OPERATION

Operating equipment outside of the company, client, manufacturer, federal, state, or local requirements. (Example: without education and authorization, inspection, overriding/disabling/ignoring safety devices, beyond limits or capacity)



CONFINED SPACE

Entering a confined space without a current permit.
Working outside the company, client, manufacturer, federal, state, or local requirements.



EXCAVATION

Working in an excavation without proper collapse/cave-in protection.
Working outside the company, client, manufacturer, federal, state, or local requirements.



GRAVITY

Walking, standing, or accessing under a suspended load. Working overhead without controls.
(Example: Barricade chain, flagging or tape, concrete barrier, guardrail protection).
Working outside the company, client, manufacturer, federal, state, or local requirements.

Policy Number 001

Authorized By: Michael W. Bennett

Title: Life Saving Absolutes

Effective Date: July 1, 2025

1 Status

- 1.1 Revised to include all subsidiaries of The Cianbro Companies.

2 Purpose

- 2.1 To ensure the health and well-being of our team members and establish minimum expectations for the most severe hazards and life-threatening situations.

3 Applicability

- 3.1 This policy applies to all team members. Any deviation, unless spelled out specifically in the policy, requires the permission of The Cianbro Companies Sr. Executive Vice President/CAO or designee.

4 Definitions

4.1 Hands Free

- 4.1.1 The U.S. Department of Transportation (DOT) defines "hands-free" mobile phone use while driving to mean using a phone in a way that doesn't require the driver to hold or reach for it with a hand. This includes using an earpiece, speakerphone, or voice-activated dialing, and requiring the phone to be within close proximity for one-button operation while the driver is properly restrained by a seatbelt. The key is to ensure the driver can initiate, answer, or end a call without needing to use a hand.

4.2 Review Committee

- 4.2.1 A group consisting of the Site Manager, Operational HR Manager, Business Unit/Market VP/General Manager and Business Unit's Director of HSE.

4.3 Executive Review Committee

- 4.3.1 A group consisting of the Sr. Executive VP/CAO, Sr. Executive of Operations, Sr. VP of Operations, TCC Corporate Director of HSE and the respective President, VP/GM of the BU/Mkt/Dept.

5 Policy

- 5.1 The rules within this policy are established to preserve human life in critical situations. These rules are absolute, meaning they must be followed strictly and without deviation. The key elements are outlined below.
- 5.2 In the event of a violation of a Life Saving Absolute, The Cianbro Companies expects managers to immediately engage with the involved team member(s) to seek understanding, coach for success, and apply the appropriate level of accountability to the severity of the violation.
- 5.3 The Cianbro Companies recognizes the following seven Life Saving Absolutes:
- 5.3.1 Elevated Work
 - 5.3.2 Energy
 - 5.3.3 Distracted Driving
 - 5.3.4 Equipment Operation
 - 5.3.5 Confined Space
 - 5.3.6 Gravity
 - 5.3.7 Excavation
- 5.4 Whenever the client or host facility safety policies are more stringent than The Cianbro Companies, we will follow their policies. Any deviation from this requires the approval of the business unit or market VP/GM.

6 Responsibilities

- 6.1 The Sr. Executive Vice President/CAO or designee is responsible to provide approval for any deviation from this policy unless spelled out specifically within the policy.
- 6.2 The senior level of management on the job site is responsible for the implementation of this policy on the project.
- 6.3 The Cianbro Companies Corporate HSE Department is responsible for maintaining this document.

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7.1 Life Saving Absolute Occurrence Process

- 7.1.1 Site leadership along with a safety professional will immediately interview the team member(s) independently to understand their account of what happened.

- 7.1.2 If determined it is a Life Saving Absolute violation, the team member(s) in violation will be sent home immediately until the remainder of the investigation can take place.
- 7.1.2 The investigation must be complete within three business days of the initial event by the project team to determine if the violation occurred and who was involved.
- 7.1.3 This report will be presented to the review committee consisting of the Site Manager, Operational HR Manager, Business Unit/Market VP/General Manager and Business Unit's Director of HSE immediately following the investigation and no later than the COB on third business day following the initial event. This team will review the case and determine the path forward.
 - If no violation is confirmed, the team member(s) will be brought back to work and paid for the time missed.
 - If a violation is found, the committee will make a determination whether the violation was:
 - **Willful** and requires immediate termination.
 - **Other than willful** and requires time off without pay per the disciplinary policy.
- 7.1.4 First offence – At a minimum 40 work hours off without pay documented in writing on the counseling report. Safe hours set back to zero. Removal of safe hours from safety helmet. The investigation will be complete in Procore using supporting investigation tools as necessary. If termination is warranted after this first offence the team member may be considered for re-employment after 12 months; however, rehire requires the approval of the Executive Review Committee.
- 7.1.5 Second offence (within one year) - Any LSA violation will result in immediate termination documented in writing on a counseling report. Safe hours set back to zero. Removal of safe hours from safety helmet. The investigation will be complete in Procore using supporting investigation tools as necessary. The team member may re-apply after 12 months; however, rehire requires the approval of the Executive Review Committee.
- 7.1.5 All Team Members regardless of their classification or position, that contribute to the Life Saving Absolute violation will be subject to the same disciplinary procedures.

7.2 Life Saving Absolutes

Life Saving Absolutes are high energy hazards that can significantly alter one's life including fatalities. Controls are required to be in place when an LSA is present.

7.2.1 Elevated Work

Working where a human fall hazard exists and not protecting or securing one from falling.

Working outside the company, client, manufacturer, federal, state, or local requirements.

7.2.2 Energy

Working without all sources of energy systems identified and controlled (live or stored).

(Example: Electricity, Gas, Chemical, **Fluid Power**, Air, Water, Steam, Radiation, Fire, Traffic etc.)

7.2.3 Distracted Driving

Any activity while operating a vehicle without having a minimum of one hand on the wheel and eyes on the road.

Using a mobile device and/or a device's applications or features other than hands free.

7.2.4 Equipment Operation

Operating equipment outside of the company, client, manufacturer, federal, state, or local requirements.

(Example: without education and authorization, inspection, overriding/disabling/ignoring safety devices, beyond limits or capacity etc.)

7.2.5 Confined Space

Entering a confined space without a current permit.

Working outside the company, client, manufacturer, federal, state, or local requirements.

7.2.6 Gravity

Walking, standing, or accessing under a suspended load.

Working overhead without controls. (Example: Barricade, chain, flagging or tape, concrete barrier, guardrail protection).

Working outside the company, client, manufacturer, federal, state, or local requirements.

7.2.7 Excavation

Working in an excavation without proper collapse/cave-in protection.

Working outside the company, client, manufacturer, federal, state, or local requirements.

8 Budget / Approval Process – Not Applicable

9 Related Documents

9.1 References