

Notice of Change to Controlled Documents #270 / 11 Sep 2015

Summary of Changes

Revisions managed by: Shannon Smith

Purpose: [270] HSE revised to emphasize teamwork approach and employee involvement required to achieve true safety. Pre-employment alcohol testing required- statement removed. Sexual Harassment section updated to include all types of harassment. Section on contractors updated to include new pre-start meeting and training requirements as well as contractor's responsibilities to follow TDI procedures. Restricted work cases to be reported to HSE Manager immediately.

NOC#	Ch., Sec., SOP	Summary	Revision#
270	Ch 2 ALL	HSE revised to emphasize teamwork approach and employee involvement required to achieve true safety. Section on contractors updated to include new pre-start meeting and training requirements as well as contractor's responsibilities to follow TDI procedures.	#17

Date Completed

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9-14-15 SS SMM TOC page updated

NOC pdf posted on CM

9-14-15 SS NOC web page updated

Vessel acks recorded

9-14-15 SS SMM- each section updated

Office controlled SMM updated

NOC sent to fleet

Approvals	Approvals
<div style="border: 1px solid green; padding: 5px;"> <p style="text-align: center; color: green;"><u>Approved for Distribution</u></p> <p>Date <u>9-14-2015</u> Initials <u>PT</u></p> <p>Print Name <u>Pete Tatro</u></p> </div>	<div style="border: 1px solid green; padding: 5px;"> <p style="text-align: center; color: green;"><u>Approved for Distribution</u></p> <p>Date <u>9-14-15</u> Initials <u>Jub</u></p> <p>Print Name <u>J. Brooks</u></p> </div>

NOC # 270

Chapter 2 General Company Policies - ALL

Revision #	Section(s)
Revision #17	See attached new Ch 2

SAFETY MANAGEMENT MANUAL



Chapter 2 Safety and Environmental Protection Policy

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Chapter 2 General Company Policies

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- 2.0 [Responsibility](#)
- 3.0 [Company Health, Safety and Environment Policy](#)
- 4.0 [Drug and Alcohol Policy](#)
- 5.0 [Firearms and Weapons Policy](#)
- 6.0 [Smoking Policy](#)
- 7.0 [Visitors](#)
- 8.0 [Harassment](#)
- 9.0 [Driving Policy](#)
- 10.0 [Short Service Employee \(SSE\)](#)
- 11.0 [Restricted Work Program](#)
- 12.0 [Management of Subcontractors](#)
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 - 12.2 [Contractor's Responsibilities](#)
 - 12.3 [Implementation & Penalties for Violation](#)
- 13.0 [No Lone Deck Work](#)

Revision/ Review Log

Revision Date	Approved by	Reviewed by	Revision Details/ Proposal Notes
11 January 2010 Revision #5	Dr. Jim Brooks	HSE Manager: Sue McDonald	
15 October 2010 Revision #6	Dr. Jim Brooks Dr. Bernie Bernard	HSE Manager: Russell Putt Capt. Pat Fallwell	Changed to electronic format
20 May 2011 Revision #7	Dr. Jim Brooks Dr. Bernie Bernard	Dr. Jim Brooks Dr. Bernie Bernard	Bloodborne pathogens and subcontractor evaluation sections added.
12 Aug 2011 Revision #8	Dr. Jim Brooks Dr. Bernie Bernard	Dr. Jim Brooks Dr. Bernie Bernard	Goal of zero accidents and no harm to personnel or environment added to HSE statement
03 May 2012 Revision #9	Dr. Jim Brooks Dr. Bernie Bernard	Dr. Jim Brooks Dr. Roger Fay Capt. Pat Fallwell	Reasonable cause testing form to be completed before testing
03 May 2012 Revision #10	Dr. Jim Brooks Dr. Bernie Bernard	Dr. Jim Brooks Dr. Roger Fay Capt. Pat Fallwell	Annual drug test requirement removed, random testing for all employees, including non-US citizens

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27 August 2012 Revision #11	Dr. Jim Brooks	Ms. Gail Mills Ms. Kathleen Nease	Drug and alcohol policies in Employee Manual and SMM merged. All new and offshore employees must sign an acknowledgement and release of drug and alcohol testing results
12 February 2014 Revision #12	Dr. Jim Brooks Mr. Pete Tatro Dr. James Howell	Dr. Jim Brooks Mr. Pete Tatro Dr. James Howell	No one may work alone on deck
28 March 2014 Revision #13	Dr. Jim Brooks Mr. Pete Tatro	Dr. Jim Brooks Mr. Pete Tatro Charlie Emerson	Drug and alcohol policy modified to incorporate Vanuatu requirements
08 April 2014 Revision #14	Dr. Jim Brooks Mr. Pete Tatro	Dr. Jim Brooks Mr. Pete Tatro	Bloodborne pathogens moved to new SOP
08 September 2014 Revision #15	Dr. Jim Brooks Mr. Pete Tatro	Dr. Jim Brooks Mr. Pete Tatro	Company HSE policy revised to include all operations- not just during projects
18 December 2014 Revision #16	Dr. Jim Brooks Mr. Pete Tatro	Dr. Jim Brooks Mr. Pete Tatro Dr. Roger Fay Dr. James Howell	Rehabilitation resources section rewritten. Training requirements added.
11 September 2015 Revision #17	Dr. Jim Brooks Pete Tatro	Dr. Jim Brooks Pete Tatro Dr. James Howell	Pre-employment drug test removed (not required) and HSE Statement revised to emphasize employee participation in a safety culture. Section on contractors updated to include new pre-start meeting and training requirements as well as contractor's responsibilities to follow TDI procedures.

1.0 Introduction

This chapter describes Company policies for TDI-Brooks' vessels. These vessels operate in compliance with applicable international, Vanuatu and U.S. Coast Guard guidelines as well as best practices.

2.0 Responsibility

The president of TDI-Brooks is ultimately responsible for the safety, and health of his employees and the protection of the environment. Managers and supervisors must take an active role in TDI-Brooks' safety and environmental programs by following established procedures to control hazards associated with TDI-Brooks activities. However, safety is the responsibility of all TDI-Brooks employees.



3.0 Company Health, Safety, and Environment Policy (HSE)

***TDI-Brooks International's Commitment to
Health, Safety and the Environment***

TDI-Brooks International is committed to providing its employees, contractors, clients, and visitors a safe environment in which to work. We strive to conduct all operations with zero accidents and no harm to personnel or the environment.

TDI-Brooks International aims to continually improve a safety and health program conforming to the best practices of offshore exploration. This program embodies the proper attitudes toward injury and illness prevention on the part of supervisors and employees. It also requires cooperation in all safety and health matters, not only between supervisors and employees, but also between employees and their co-workers.

The safety and health of every employee is the highest priority. Management provides the proper equipment, tools, training, supervision and policies to ensure a safe work environment. Employees take responsibility for performing work in accordance with safe standards and practices.

Real safety will only be achieved through teamwork. Employees, contractors, clients and visitors must work together in promoting a safety attitude and taking every reasonable measure to work in a safe and environmentally responsible manner.

A handwritten signature in blue ink that reads 'Jim Brooks'.

President

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4.0 Drug and Alcohol Policy

In accordance with U.S. Coast Guard and the Vanuatu Administration, TDI-Brooks has a "ZERO TOLERANCE" for possession or use of any illegal drugs. The policies of these Flag States are very similar. In instances where they overlap, the stricter policy shall apply.

As part of this policy, no intoxicating beverages, illegal drugs, paraphernalia or equipment related to illegal drug use are allowed aboard vessels, in offices or other work locations of the company. Any TDI-Brooks employee found in possession of alcohol/ illegal drugs is subject to immediate termination.

4.1 Pre-Employment and Random Testing

TDI-Brooks employees must pass a pre-employment drug test before working offshore and are subject to random testing based on the flag state requirements. **The current testing rate is 50%.** *requirement is for 50% of the maine crew to be randomly tested each year.*

4.2 Reasonable Cause Testing

Reasonable cause testing will be undertaken whenever a supervisor has cause to believe that an employee is under the influence of drugs or alcohol based on physical, behavioral, and performance issues. Any near-misses, accidents, or suspicious behavior can trigger a drug and alcohol test.

The employee's direct supervisor will complete the Reasonable Cause Testing form before the test is performed. The Reasonable Cause Testing form is located on the ship web pages on the SMM Forms Only page. The HSE Officer on site is authorized to approve reasonable cause testing.

The fact that a **reasonable cause test was conducted and any refusals to test must be entered into the vessel's official logbook.** An employee refusing to comply with reasonable cause testing will be immediately removed from any safety sensitive position and may face termination.

If the employee cannot be transported to an approved clinic or hospital for testing, testing/ collection may be conducted aboard the vessel. However, the testing/ collection may not be conducted by the person requesting the test.

Any reasonable cause testing will be reported to the DER and upper management as soon as possible. The Designated Employee Representative (DER) of TDI-Brooks is responsible for managing drug and alcohol testing and records for the company.

4.3 If a Drug Test is Positive *Drug Test Results*

If the results of a drug test for a **crew member** are verified positive, the employee will be immediately removed from performing safety-sensitive functions and may not return to safety sensitive functions without completing the return to duty process.

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The positive results of any employee holding a license or endorsement must be reported to the appropriate Maritime Administration by management.

4.4 Searches

Entry into or upon any vessel, office or other work location of the company is conditioned upon the company's right to search the person, personal effects and vehicle for illegal drugs, intoxicating beverages, firearms, or possession of unauthorized property or equipment. Any items discovered during a search may be turned over to the proper authorities as appropriate.

Possession of items in violation of company policy or refusal to submit to a search is grounds for disciplinary action up to and including immediate termination.

4.5 Testing Facilities

Only certified facilities will be used to analyze all drug and alcohol tests. Should a test need to be administered in a foreign country, every effort will be made to assure that standard chain-of-custody protocols are followed to ensure the integrity of the tests.

4.6 Acknowledgement and Release Form

All employees who work offshore are required to sign a copy of the Acknowledgement and Release Form regarding the Drug and Alcohol Policy as a condition of employment.

4.7 Employee Assistance Program (EAP)

TDI-Brooks provides an Employee Assistance Program in the form of a substance abuse hot-line telephone number posted on each vessel. The employee is financially responsible for any services provided.

4.8 Training Requirements

TDI-Brooks offers computer based training on drug use and abuse, the effects of drug and alcohol use on personal health, safety and the work environment and the behavioral indications of use/ abuse. Supervisors receive 60 minutes of training to meet the requirements of 46 CFR Part 16.401(b).

5.0 Firearms and Weapons Policy

Firearms or any other type of weapons are not permitted aboard the vessel. The exception to this policy is if the vessel is in a region where the threat of violence necessitates the presence of armed guards.

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6.0 Smoking Policy

Smoking is prohibited in the interior of any TDI-Brooks property or vessel and is allowed ONLY in exterior designated areas. Tampering with smoke detectors on the vessel may result in immediate dismissal.

7.0 Visitors

All visitors must sign in and will receive a safety orientation. Visitors are not permitted to roam about the vessel without an escort.

Entry into restricted areas requires permission from the Deck or Engineering Officer in Charge and requires an escort.

8.0 Harassment

Harassment is defined as the continuing unwanted actions or comments of a person or group, including threats or demands. Such actions, comments or conditions create a fearful, intimidating, offensive or hostile work environment.

TDI-Brooks does not tolerate harassment of any kind. Suspected harassment should be immediately reported to the HSE Officer on site.

TDI-Brooks will permit no employment-based retaliation against anyone who brings a complaint of harassment or who speaks as a witness in the investigation of a complaint of harassment.

9.0 Driving Policy

The following apply to company vehicles and personal vehicles used for company business.

- Only company employees or persons authorized by the supervisor will be permitted to ride in TDI-Brooks vehicles.
- All drivers operating a vehicle for TDI-Brooks business must have a valid driver license and obey government and local regulations.
- The driver and passengers must use seat belts when in company vehicles.
- The driver may not text or talk while driving.

10.0 Short-Service Employee (SSE)

The Short Service Employee Program assures that SSEs receive the necessary training that will ensure their health and safety, as well as the health and safety of those working with them.

An SSE is an individual who **has not worked more than six (6) months of service with the company or in that particular position.** For example, an employee who has worked

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over 6 months with the company as a winchman who is moved to work in the laboratory would be considered a short service employee in the laboratory.

The main components of the TDI-Brooks SSE program include the following:

- SSEs will be easily visually identified to the crew by a different colored hard hat, work vest, colored bandana or some other easy to see method to differentiate SSEs in work zones.
- A current employee who is fully trained and qualified with respect to their job and HSE issues will be assigned as a mentor to each SSE. The mentor will ensure that the SSE only performs tasks for which they have received proper training and that they operate in a safe manner.
- The mentor and a supervisor will evaluate the performance of the SSE and decide when the SSE is fully qualified for the job.

11.0 Restricted Work Program

The Restricted Work Program allows injured or ill employees to work in their original position on a modified schedule or an alternate position with restrictions. All restricted work situations must be immediately reported the TDI-Brooks HSE Manager.

Modified or alternate work duty: Any productive job, task or function that can be performed by a worker who has suffered from a diminished capacity, temporarily or permanently due to a work related accident, and without risk or re-injury to themselves or others.

12.0 Management of Contractors

TDI-Brooks International hires contractors such as medics, technicians, marine mammal observers or survey specialists for various positions or projects. In addition, contractors are frequently required for construction or repair on our vessels or at our facilities. Contractors and their subcontractors are expected to follow TDI-Brooks safety policies and procedures at all times.

TDI-Brooks reserves the right to audit/ inspect the contractor's HSE program, equipment, records and operations before and during performance of the work.

12.1 BEFORE WORK MAY BEGIN

Contractor Safety Meeting- Before starting work, the Facility Manager or Master of the Vessel will conduct a meeting with all contractors and their supervisors to review TDI-Brooks policies and safety expectations. The concepts listed below must be agreed upon by the HSE Officer on site and the main contractor supervisor and communicated to all workers before work may begin.

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Job Safety Analysis (JSA)- Before beginning any task, a written JSA will be conducted and all persons doing the work will participate and sign.

Muster Areas and Emergency Alarms- A single general alarm will be agreed upon and sounded so workers will recognize it. Workers will be instructed/ shown where to muster upon hearing that alarm.

Permitted Work- a permit is required to conduct Hot Work, Energy Isolation (Lockout-Tagout), Working at Heights (6 ft or 3 m above the deck) or enter any Confined Space.

Personal Protective Equipment (PPE)- Each company is required to provide required PPE for their own employees. Work may not begin without appropriate PPE.

Restricted Areas- Entry into restricted areas requires permission from the Deck or Engineering Officer in Charge and may require an escort.

Short Service Employees- Employees with less than 6 months experience with the contractor or TDI-Brooks will wear something to easily visually identify them as short service employees.

Stop Work Authority- All workers on the site, regardless of employer, position or seniority, are authorized and expected to STOP WORK if they see anything being done in an unsafe manner or if they are uncertain what their role is in the task at hand.

12.2 Contractor's Responsibilities

Contractors are responsible for:

- Communicating to their employees the health and safety policies and expectations of TDI-Brooks
- Providing task-appropriate PPE for their employees
- Ensuring that their equipment is in safe and proper working condition
- Correcting unsafe conditions promptly and to the satisfaction of TDI-Brooks
- Conducting regular safety meetings for their employees or participating in joint safety meetings conducted by TDI-Brooks
- Monitoring their work activities to ensure safe working practices and conditions
- Notifying the TDI-Brooks HSE Officer on site immediately about any accidents involving their employees on TDI-Brooks' vessels or property.

12.3 Implementation & Penalties for Violation

Local TDI-Brooks management is responsible for implementing this policy for each of its Contractors. The contractor will take prompt action to correct any violations to the satisfaction of TDI-Brooks management.

Violation of TDI-Brooks' policy or any applicable government law or regulation is grounds for cancelation of contract and revocation of access by the offending parties to any TDI-Brooks or client property.

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13.0 No Lone Deck Work

TDI employs the buddy system for deck operations. No one should go out on the main deck alone. Always have someone go out on the deck with you, even if it is just to observe you and raise the alarm if you fall overboard.

Vessel Visitors & Contractors

TDI-Brooks requires all shipboard visitors and contractors to comply with the following safety/ security policies.

NO UNAUTHORIZED ENTRY - YOU ARE SUBJECT TO SEARCH

- ▶ You must possess and present a VALID PHOTO ID.
- ▶ You must SIGN IN to the visitors log when you arrive and SIGN OUT when you leave.
- ▶ Smoking is permitted in DESIGNATED EXTERIOR AREAS of the vessel only.
- ▶ You must wear required PERSONAL PROTECTIVE EQUIPMENT for any area you enter.
- ▶ ALCOHOL and ILLEGAL DRUGS are PROHIBITED.
- ▶ INJURIES and ILLNESSES should be reported immediately to the Bridge.



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President



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