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Chapter 2 – Safety and Environmental Protection Policy

References:

[SOLAS] *Safety of Life at Sea* (2024)

[ISM Code] *International Safety Management Code* (2018)[

1. Introduction

1.1 Regulatory Backdrop:

Per Chapter IX of SOLAS, as further specified in the ISM Code, TDI Brooks must establish as part of our SMS, and include within our SMM, a safety and environmental protection policy that describes how the objectives stated in **Chapter 1 Section 1.5** will be achieved. We must also ensure that the policy is implemented and maintained at all levels, both ship-based and shore-based. This **Chapter 2** presents our safety ethos, our policy, and how we will achieve those objectives.

1.2 Responsibilities:

- **Senior Management** (as defined in **Chapter 3**) is responsible for establishing our safety ethos (culture, vision, goals, objectives, policies, and behavioral expectations and imperatives) in order to reduce workplace hazards to the greatest extent possible and to facilitate a climate that sustains a culture of safety, professionalism, and continual improvement. This vision is to be pursued by Senior Management through leadership modelling and messaging, active tracking of performance measures, and resource provision.
- **All managers**, ashore and afloat, are responsible for promoting a climate that facilitates these measures and for modelling respect and safety comradery.
- **All employees** are responsible for the safety of their co-workers as well as their own.

2. Safety Ethos

2.1 Management Commitment:

We are committed to providing our employees, contractors, clients, and visitors with a safe environment in which to work. We strive to conduct all operations with zero accidents and no harm to personnel or the environment. We intend to continually improve a safety, health, and environmental (HSE) program that conforms to, or exceeds, industry best practice. This program commits to embody proper attitudes toward accident, injury, and illness prevention and response.

2.2 Safety Comradery:

The safety and health of every employee and the protection of the environment are our highest value and priority. Management is to provide the proper equipment, tools, training, supervision, and policies to ensure a safe work environment. Each employee must take responsibility for performing work in compliance with these SMS objectives, standards and practices. Real safety will only be achieved through teamwork, good-faith, self-honesty, critical thinking, and selflessness. Employees, contractors, and client representatives must work together with a spirit of *safety comradery* to promote our safety culture and must take every reasonable measure to work together in a safe and environmentally-responsible manner.

3. Safety Objectives

We have broken out our **Chapter 1** SMS objectives into six elements, each beginning with an action verb:

- provide for safe practices in ship operation and a safe working environment,
- assess all material risks to our ships, personnel, and the environment,
- establish appropriate safeguards to mitigate these risks, and
- improve the safety management skills of our personnel ashore and aboard our ships,
- prepare for safety and environmental protection emergencies.
- ensure that compliance with regulations and industry best practice standards is met or exceeded.

3.1 Approach:

We intend to achieve these objectives in this manner:

- **Provide**: Management will commit to, define, review, and enforce our SMS with specific mandatory requirements that ensure or exceed regulations and industry best practice. Management will enforce the policy that ALL personnel have the right to STOP WORK if they deem a particular task unsafe, with no repercussions from management.
- **Assess**: We will approach all work activities by first identifying hazards. We will then assess the risks associated with those hazards by building a Risk Register prior to each job. All identified hazards for a job will be mitigated in the register to an acceptable risk level on a task-by-task basis prior to undertaking operations.
- **Establish**: We will define our risk tolerance in a matrix of a set of probability classifications vs. a set of consequence classifications. We will then rank each hazard in the job's register by probability and severity of consequence to see if further mitigation is needed. In order to reduce the impact of a hazard to an acceptable risk level, we might need to add additional mitigations to a task.
- **Improve**: All levels of management and staff will participate in the improvement of our SMS by having opportunity for input, feedback, and review. This participation will help each person to heighten awareness, deepen camaraderie, and improve skills in safety management.
- **Prepare**: Our SMS will include an array of emergency and complex incident drills and a set of annual safety initiatives that we must conduct on a regular schedule
- **Ensure**: We will have a manager tasked with continuously monitoring our compliance with regulations and will conduct regular management reviews of our safety performance against industry standards, including our response performance upon injury.

3.2 Procedures:

Detailed instructions and procedures for achieving each of these objectives are presented in later chapters and the appended SOPs of this SMM.

3.3 Initiatives:

Each year we will establish, track, and review a set of key performance indicators (KPIs) aimed at each of these action elements. We will then create two safety initiatives based on learnings from our then-current KPIs for the purpose of measuring how well we are achieving our objectives.

4. Statement for Posting

Senior Management's Commitment to Health, Safety, and the Environment is embedded here.



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