

Chapter 13 General Policies

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1.0 Introduction

This chapter contains general policies that may not directly relate to the International Safety Management Code (ISM code) but affect the safety of our employees and operations.

2.0 Drug and Alcohol Policy

In accordance with the 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.

2.1 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.

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2.2 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 HSE Manager / HSE Officer / Project HSE Officer is authorized to approve reasonable cause testing.

In the instance of a **reasonable cause test being conducted, 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.

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

2.3 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.

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

2.4 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's Employee Policy Guide or refusal to submit to a search is grounds for disciplinary action up to and including immediate termination.

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2.5 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 test results.

2.6 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.

2.7 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.

2.8 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 training to meet the requirements of 46 CFR Part 16.401(b).

3.0 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.

4.0 Smoking and Vaping Policy

Smoking and vaping are 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.

5.0 Visitors

All visitors must sign in and will receive a safety orientation. Visitors are not permitted to go beyond ship's rail or interior spaces without an escort.

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

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6.0 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 employee or 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.

7.0 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.
- Vehicles will be of correct size and used as designed for intended use.
- Trailers (if required) will be secured properly to the vehicle, safety chains will be in place, trailer lights will be checked and proper trailering speed will be maintained at all times.
- Loads will be secured and within manufacturer's legal limits.
- The driver and passengers must use seat belts when in company vehicles.
- Company vehicles shall be maintained in safe working order.
- The driver may not text or talk on the phone while driving.
- Any traffic violations or accidents occurring while on company business shall be reported to the HSE Manager (HSE@tdi-bi.com) within 24 hours.

8.0 Transportation of Hazardous Materials

TDI-Brooks does not transport hazardous materials either on our vessels or in company vehicles. We are therefore not required to have a HazMat plan. Waste materials produced by our operations are classified as oily waste.

Oily waste is contained in sealed vessel tanks or in sealed, clearly labeled storage barrels until proper pickup and disposal by an appropriately licensed third party can be arranged.

Documentation of oily waste removal is recorded in the vessel oil record books. Associated receipts and documents for oily waste removal are kept on board the vessel for a minimum of two years.

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Loading and securing the oily waste for transport are the responsibilities of the removal contractor.

Training of our crews is provided in the form of Ship Oil Pollution Emergency Plan (SOPEP) or Non-tank Vessel Response Plan (NTVRP) drills. These drills are scenarios in which accidental release of oily waste is discovered and immediately reported to the appropriate authorities, flag states and the vessel operators in accordance with applicable regulations.

9.0 Short-Service Employee (SSE)

The SSE 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 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.

10.0 Restricted Work Program

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

A modified or alternate work duty which is identified as 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, may be allowed at the discretion of the company.

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11.0 No Lone Deck Work

TDI-Brooks employs the buddy system for deck operations. Do not 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.

12.0 Working Near/ Over Water

Employees working **near water** where the risk of a man overboard exists are required to wear a **US Coast Guard approved work vest**. These are to be inspected before and after each use by the employee.

Employees working **over water** are required to wear a **US Coast Guard approved life jacket**. Life jackets are inspected before and after each use by the employee and by the bridge crew as part of the monthly safety equipment inspections on the vessel.

Life ring buoys are provided as required by Safety of Life at Sea (SOLAS) and the Flag State on TDI-Brooks vessels and are readily available for emergency deployment. (TDI-Brooks vessels are under 200 feet in length and have low freeboards.)

Rescue boats are provided on Vanuatu Flagged TDI-Brooks vessels.

Our offshore maritime crew are well trained on working near or over water by the Standards of Training, Certification and Watchkeeping (STCW) Survival at Sea training requirements for their licenses. Our offshore technical employees are also required to take Survival at Sea or Basic Offshore Safety Induction and Emergency Training (BOSIET)/ Helicopter Underwater Escape Training (HUET) training every five years.

A Job Safety Analysis (JSA) will reveal and provide for any additional required training for a specific task. All participating workers will complete the Job Safety Analysis as a group and each individual will sign it before work may begin.

13.0 Noise Awareness / Hearing Conservation

TDI-Brooks views noise awareness and hearing conservation as one and the same. All offshore employees are required to complete a Hearing Conservation training course within 30 days of hire. This training course covers:

- information on how the ear works
- types of hearing problems
- causes of hearing damage
- potential effects of hearing injuries
- noise awareness and avoidance and other safety practices
- the use of personal protective equipment

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Refresher training is required whenever the Personal Protective Equipment (PPE) or processes change or **annually at a minimum**. Hearing conservation/ noise awareness is covered in many of our weekly Health, Safety & Environment (HSE) toolbox talks and is available in our computer based training program.

A variety of hearing protection equipment is provided at no cost to the employees and replaced as necessary. The employee may select from available types of hearing protection applicable to the specific task he is performing and must wear appropriate hearing protection in all areas where it is required by signage, the Job Safety Analysis (JSA) or the PPE Matrix.

14.0 Resupply / Hand Carry Items

When preparing luggage for hand carry, this operating procedure will be followed and includes a checklist to be signed by both the packer and the carrier.

14.1 Pre-pack

Before packing, all items will be inspected and confirmed non-hazardous/ dangerous goods according to the Safety Data Sheet (SDS) provided by the vendor/ shipper and the general lists at the following addresses: <https://www.tsa.gov/travel/security-screening/prohibited-items> and http://www.faa.gov/about/initiatives/hazmat_safety/

Once items are all confirmed non-hazardous, all items will be inspected as a whole package to ensure no dangerous interactions between items.

Lithium batteries must be carried on and not placed in checked luggage.

14.2 Packing

Once all items are confirmed safe to fly, items will be packed in luggage with paper packing material, foam, or air pockets to ensure the protection of the items. All batteries must have contacts covered and multiple batteries may not be packed in secondary containers together.

All electrical devices will be tested to ensure there is no active current. Any materials that require an SDS will have the sheet printed and accompanying the item. Contents should be secured inside luggage to ensure shifting during travel will not compromise any items.

14.3 Inspection

After packing is complete, luggage will be closed, weighed to ensure weight requirements and handled to simulate travel movement. The packer will then reopen the luggage to confirm contents are still properly packed and protected.

An invoice will be created for customs that identifies and values each item. Finally, packer will complete the Hand Carry Checklist with the person carrying the item.

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14.4 Delivery

Upon arrival at the vessel, the **resupply luggage is to be given to the Chief Mate**, who will save a copy of the invoice / inventory in the ship's records and send a message to resupply that the luggage was delivered. The Chief Mate is responsible for distributing the items to the proper parties/ departments.

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