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Chapter 1 – Safety Management System - General	
References:	[SOLAS] Safety of Life at Sea (2024) [ISM Code] International *Safety Management Code* (2018) [OVMSA] OCIMF Offshore Vessel Management and Self-Assessment, A Best Practice Guide (2019) [IOGP] Contractor HSE Capability Assessment and scoring system (Report 423-01)

1. Introduction to SMS

1.1 Regulatory Backdrop:

Per Chapter IX of SOLAS, as further specified in the ISM Code, TDI Brooks must implement and maintain a Safety Management System (SMS) that governs our vessels exceeding 500 Gross Tons and engaging in international voyages. We voluntarily extend SMS coverage to all our vessels regardless of tonnage or route.

1.2 SMS Requirements:

The ISM Code requires our SMS to have these functional requirements:

- a safety and environmental protection policy,
- instructions and procedures to ensure the safe operation of our ships and protection of the environment in compliance with relevant international and flag State legislation,
- defined levels of authority and lines of communication between and among shoreside and shipboard personnel,
- procedures for reporting accidents and non-conformities within the provisions of the ISM Code,
- procedures to prepare for and respond to emergencies and
- procedures for internal audits and management reviews.

1.3 SMS Purpose:

Among our Corporate Values is the belief in *pursuing true, systematic, effective safety*. We have thus established the scope, policies, and structure of this SMS with the expressed purpose of causing no harm to any individual or any degradation of our environment as we carry out our marine operations. We also intend to fully comply with the rules and regulations of **Section 1.1** and **Section 1.2** while also incorporating codes, guidelines, and standards recommended by our industry's maritime organizations and classification societies and as guided by our Values. The solutions provided by our SMS are of our own making, and best suit our needs.

1.4 SMS Best Practices:

Oil Companies International Marine Forum (OCIMF) primarily focuses on the safe and environmentally responsible transportation of crude oil, oil products, and gas by vessel, including related offshore marine operations. OCIMF specifies additional safety practices for contractors employed by OCIMF member companies. Because we frequently work offshore for OCIMF member companies, our SMS may also incorporate OCIMF criteria.

International Association of Oil and Gas Producers (IOGP) is a broader organization encompassing the entire petroleum industry, including upstream oil and gas production, and also includes industry associations and upstream service companies such as ours. IOGP identifies and shares best practices, promotes safety and environmental improvements, and provides a platform for collaboration, including such with OCIMF. As such, our SMS may also incorporate various IOGP best practice and fully endorses the nine published IOGP Life Saving Rules.

1.5 SMS Objectives:

Our Senior Management's objectives for our SMS are to:

- provide for safe practices in ship operation and a safe working environment,
- assess all identified risks to our ships, personnel, and the environment, then establish appropriate safeguards and
- continuously improve the safety management skills of our personnel ashore and aboard our ships, including preparing for safety and environmental protection emergencies.

2. Introduction to SMM

2.1 SMM Purpose:

Per **Section 1.2** above, we are to establish, maintain, and enforce a functional set of policies, levels of authority, lines of communication, instructions, and procedures. The set of documents used to describe and implement our SMS is called our Safety Management Manual (SMM). This SMM has 14 chapters, each corresponding to a section of the ISM Code. Appended as a part of our SMM are a set of standard operating procedures (SOPs) for our marine operations. The 14 chapters define our policies, levels of authority, and lines of communication. The SOPs, including their checklists, intended to document performance and ensure compliance, comprise our instructions and procedures.

2.2 SMM Intentions:

In issuing this SMM, we aim to communicate our approach to ensuring effective compliance with all applicable rules and standards and to address any ambiguities or subjectivity generated by the evolving set of applicable guides. The directives established by our SMM specify and summarize the vessel workplace safety culture, intentions, and behavior we expect of all onboard and shoreside support personnel. Personnel are expected always to utilize good professional, selfless judgment and to take proactive action to mitigate unnecessary risk, including actions not directly described in this SMM.

2.3 SMM Scope:

The four departments of our company are indicated in **Section 2** below. This SMM addresses only the ***Marine*** element of our operations. Within our ***Marine*** operations, the variety of vessel types and sizes and their diverse operational usage necessitate discretionary interpretations. A competent and experienced application of good seamanship and sound marine engineering practice should supplement these policies, levels of authority, lines of communication, instructions, and procedures.

Where an SMM policy, directive of authority, communication protocol, or SOP is perceived to create an unsafe or imprudent action, the vessel's **Master** is charged with applying good judgment and seamanship practice. Except for work performed by ***Marine*** shoreside support under the ISM Code, this SMM does not govern shoreside workplace safety at our main campus.

2.4 SMM Revisions:

We intend to put effort into continual improvement in each of the elements of our corporate activities, including our SMM. After a revision of our SMM is issued, we will continue to gather ideas, recommendations, audit results, and best-practices for its improvement. We will issue a new revision of the SMM each year, making the most needed or effective improvements. We will then review the revision changes with our personnel in Key Positions and will ensure their understanding of the new revision.

3. Introduction to TDI-Brooks

3.1 Ashore:

TDI-Brooks has one main campus, which hosts administrative, laboratory, technical fabrication, testing, and maintenance, as well as shore-based vessel support personnel and inventory. We have segmented our overall organization and operation into 4 departments: ***Marine***, ***Tech***, ***Lab***, and ***Admin***. The primary campus contact information is as follows:

TDI-Brooks International, Inc.
14391A South Dowling Road
College Station, TX 77845 USA
Office: +1 (979) 693-3446

3.2 Afloat:

Field operations are performed in numerous foreign and domestic marine locales. Staffing for these operations is comprised of our ***Marine & Tech*** personnel on a vessel. Field operations take the form of scientific research surveys managed by a survey team leader called the **Party Chief**. This survey team represents the ***Tech*** portion of the **M*arine & Tech*** staffing of a vessel.

TDI-Brooks provides and crews multi-service vessels for such surveys on a global basis, whether contracted by a customer or for our own research purposes.

Table 2.1 provides a list of TDI-Brooks-managed vessels that come under this SMM:

Table 2.1

Vessel Name	Flag	Class	>=500 GT ITC[2]	International Voyages[3]	ISM Application[4]
Brooks McCall	United States	ABS[1]	X		Voluntary
Miss Emma McCall	Vanuatu	ABS		X	Voluntary
Proteus	Vanuatu	ABS	X	X	Mandatory
Gyre	Vanuatu	IBS	X	X	Mandatory
Nautilus	Vanuatu	RINA	X	X	Mandatory

[1] Load line certificate only

[2] Per MSC.1/Circ.1231, ITC 66 governs ISM application instead of IMO MSC/Circ. 635, which exempts vessels built before 31DEC1985 from SOLAS.

[3] Per Part A, Regulation 2 of the 1974 SOLAS Convention, SOLAS applies only to vessels engaged on Int'l Voyages

[4] See the applicability of ISM in Chapter XI, Regulation 2 of SOLAS (2020), and Regulation 2 of ISM Code (2018)