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Chapter 13 General Policies

References:

[ISM Code] *International Safety Management Code* (2018)
 [MLC 2006] *Maritime Labor Convention* (2006)

1. Introduction

1.1 Regulatory Backdrop:

The ISM Code does not specify guidance for *General Policies*. This chapter contains our policies that may not directly relate to the ISM Code, but all affect the safety of our employees, so we have included them in our SMM. These policies apply company-wide and are related to topics found in our **Employee Handbook**. Company policies apply to seafarers only to the extent they are consistent with MLC 2006 and Flag State. Where any conflict exists, MLC 2006 and Flag State requirements prevail at all times.

1.2 Our Objectives:

Our objective here is to present policies that address various personnel matters we have deemed necessary for safe operations but that fall outside of ISM Code guidance. A corollary objective is to provide such policies in our **Employee Handbook** as consistent with those in this chapter.

1.3 Definitions:

DER: Designated Employer Representative – an employee we have authorized to manage our drug and alcohol testing and fit-for-duty programs for mariners. This role is not federally required for us, but we have appointed a DER to ensure privacy, fairness, smooth operation, and compliance with laws and industry standards.

HR Manager: Human Resources Manager - our manager responsible for planning, directing, and coordinating our human workforce functions. This position serves as a link between management and employees.

JSA: Job Safety Analysis - a written tool used to find and control hazards inherent to a particular job. It breaks a task into small parts, looks at the risks for each part, and sets safety rules to mitigate each of these risks to reduce the chance of an accident or other safety-related incident.

SDS: Safety Data Sheet - a standard 16-section document that details the hazards, properties, safe handling, and emergency response procedures for a chemical product. Formerly known as Material Safety Data Sheets (MSDS), they are required by the Occupational Safety and Health Administration (OSHA) to keep workers safe.

PPE Matrix: Personal Protective Equipment Matrix - a visual chart used to map specific tasks, job roles, or work zones to the exact protective gear required to mitigate associated hazards. It is intended to eliminate guesswork, standardize safety protocols, and ensure regulatory compliance.

SSE: Short Service Employee - employee who has not worked for more than six (6) months of service with us or in a new position with us. For example, an employee who has worked for over 6 months as a winchman who is now moved to work in the laboratory would be considered a short service employee in the laboratory. SSEs may be exposed to new hazards that need to be mitigated by training or practice with a mentor.

VMS: Vessel Management System - integrated system used for our marine operations, document repository, preventative maintenance system, regulatory compliance and safety documentation, marine personnel management, vessel logs, and performance reports. Our VMS is named *Helm Connect*.

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2. Policies

2.1 Drug and Alcohol:

In accordance with U.S. Coast Guard and the Vanuatu Administration, TDI-Brooks shall have 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 shall be allowed aboard vessels, in offices or other work locations of the company. Any employee found in possession of alcohol/ illegal drugs shall be subject to disciplinary action up to and including termination.

2.2 Pre-Employment and Random Testing:

Employees shall pass a pre-employment drug test before working offshore and are subject to random testing based on the flag state requirements.

2.3 Reasonable Cause Testing:

Reasonable cause testing shall 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 may trigger a drug and alcohol test. The employee's direct supervisor shall complete the Reasonable Cause Testing form before the test is performed. The Reasonable Cause Testing form is provided in the VMS. The HSE Director shall be authorized to approve reasonable cause testing.

The fact that a reasonable cause test was conducted and any refusals to test shall be entered into the vessel's official logbook. An employee refusing to comply with reasonable cause testing shall be immediately removed from any safety sensitive position and may be subject to disciplinary action up to and including termination.

If the employee cannot be transported to an approved clinic or hospital for testing, testing collection shall be conducted aboard the vessel. However, the testing/collection shall not be conducted by the person requesting the test. Drug test collection shall be done by the medic (if one is on board) or the Master and held refrigerated until it may be transported to a proper testing facility. Alcohol swab tests shall be conducted by the medic (if one is onboard) or the Master. A positive test will trigger a second test for confirmation.

Any reasonable cause testing shall be reported to the DPA as soon as possible. Completed Reasonable Cause testing form originals will be kept onboard the vessel for a period of five years. A copy of the completed Reasonable Cause Testing Form will be sent directly to the HR Manager. Our DER shall be responsible for managing drug and alcohol testing and records.

2.4 Drug Test Results:

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

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

2.5 Searches:

Entry into or upon any vessel, office or other work location of the company shall be conditioned upon our 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 shall be turned over to the proper authorities as appropriate. Possession of items in

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violation of policy or refusal to submit to a search shall be grounds for disciplinary action up to and including immediate termination.

2.6 Drug Testing Facilities:

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

2.7 Acknowledgement and Release Form:

All employees who work offshore shall be required to sign a copy of our Acknowledgement and Release Form regarding the Drug and Alcohol Policy as a condition of employment. This form shall be provided in the VMS.

2.8 Fit-for Duty Examination:

All employees who work offshore shall be required to pass a fit-for-duty medical examination at least bi-annually to maintain their sea-going qualification.

2.9 Employee Assistance Program (EAP):

We shall provide an Employee Assistance Program in the form of a substance-abuse hot-line telephone number posted on each vessel. The employee shall be financially responsible for any services provided.

2.10 Drug Abuse Training:

We shall offer 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 shall receive 60 minutes of training to meet the requirements of 46 CFR Part 16.401(b).

2.11 Firearms and Weapons:

Firearms and any other type of weapon shall not be permitted aboard our vessels. The exception is if the vessel is in a region where the threat of violence necessitates the presence of armed guards on-board.

2.12 Smoking on Vessels:

Smoking and vaping shall be prohibited in the interior of any of our vessels and is allowed ONLY in designated exterior areas. Tampering with smoke detectors on the vessel shall result in immediate dismissal.

2.13 Visitors on Vessels:

All vessel visitors shall sign in and shall receive a safety orientation. Visitors shall not be permitted to move about the vessel without an escort. Entry into restricted areas shall require permission from the Topside or Engineering Officer in Charge and shall require an escort.

2.14 Harassment:

Harassment shall be defined as the continuing unwanted actions or comments of a person or group, including threats or demands. We shall not tolerate harassment of any kind. Suspected harassment shall be immediately reported to the HSE Officer on the vessel and to the HR Manager. We shall 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.

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United States Coast Guard Requirements to Address Sexual Assault and Sexual Harassment Prevention and Response on Vessels (U.S. Flagged):

- We shall require any suspected act of sexual harassment/assault incident to be immediately reported to the Master and/or HSE Manager on the vessel. That officer shall then IMMEDIATELY inform the DPA of the incident. After notifying the DPA, an incident report shall be completed and submitted into our VMS and to our HR Manager within 24 hours.
- The DPA shall, in accordance with USCG policy, report the incident to the U.S. Coast Guard via either the CGIS Tips App, via email- CGISTIPS@uscg.mil, or by phone at (202)-372-2100.
- Posting of the Sexual Misconduct Reporting and Investigation Process diagram, along with our Harassment Policy shall be required in all berthing areas and common wash areas onboard U.S. Flagged Vessels.

2.15 Workplace Harassment Training:

We shall require all employees who sail on our vessels to undergo training for “Sexual Harassment Prevention in the Workplace”. All senior level employees (Masters, Mates, Engineers, party chiefs) are also required to undergo training for “Preventing Sexual Harassment for Managers and Supervisors”. Both training modules are available through our Computer Based training app Moxie.

2.16 Driving:

The following shall apply to company vehicles and personal vehicles used for company business. For company vehicles, also see our **Employee Handbook**.

- Our company vehicle insurance policy is available upon request at HSE@tdi-bi.com.
- Only company employees authorized by our insurer shall be permitted to drive company vehicles. Our HR Manager maintains this authorized driver’s list.
- All drivers operating a vehicle for business shall have a valid driver license and obey government and local regulations.
- All drivers operating a vehicle for business shall obey the posted speed limits.
- Vehicles shall be of correct size, fit for purpose, and used as designed for intended use.
- Loads shall be secured and within manufacturer and legal limits.
- The driver and all passengers shall use seat belts when in company vehicles.
- Company vehicles shall be maintained in safe working order.
- The driver shall not text or talk holding the phone while driving.
- Any traffic violations or accidents occurring while on company business shall be reported to the HSE Director (HSE@tdi-bi.com) and direct supervisor within 24 hours to include description and photos of the incident. The incident report shall also be copied to our HR Manager.

2.17 Hazardous Materials:

We shall not transport hazardous materials on our vessels or in company vehicles. We shall therefore not be required to maintain a hazardous materials plan (HAZMAT Plan).

2.18 Short-Service Employee (SSE):

We shall maintain an SSE Program to ensure that SSEs (see in **Section 1.3** definition) receive the necessary training that will protect their health and safety, as well as the health and safety of those working with them. The components of our SSE program are:

- SSEs shall be easily visually identified to the vessel crew by wearing a specifically colored hard hat, work vest, bandana or other visual marker to highlight SSEs working in hazardous work zones.

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- An employee who is fully trained and qualified in the job and our safety system shall be assigned as a mentor to each SSE. This mentor shall ensure that the SSE only performs tasks for which they have received proper training and that they continue to operate in a safe manner and in accordance with any relevant JSA.
- The mentor and supervisor will evaluate the performance of the SSE and decide when the SSE is fully qualified for the job.

2.19 Restricted Work Program:

We shall offer a Restricted Work Program that allows injured or ill employees to work in their original position on a schedule or position modified with restrictions approved by and company and their physician. Such modifications are intended to create jobs that can be effectively and performed by a worker who has suffered from a diminished capacity due to a work-related accident. All restricted work opportunities shall be immediately submitted to the HR Manager for approval.

2.20 No Lone Deck Work:

We shall use the buddy system for deck operations. No one shall go out on the main deck alone but shall have at least a spotter on the deck with them.

2.21 Working Near or Over Water:

Employees working near water where the risk of a man overboard exists shall wear a US Coast Guard approved work vest. These vests shall be inspected before and after each use by the employee. Employees working over water shall also wear a fall-arresting harness that has been inspected and managed as lifting gear.

2.22 Survival at Sea Training:

Our maritime crew shall be trained by the STCW survival requirements for their licenses. Our offshore technical employees shall be required to take and pass Survival at Sea training or BOSIET/ HUET training every four (4) years.

2.23 Hearing Conservation Training:

We view noise awareness and hearing conservation as one and the same. All offshore employees shall complete a Hearing Conservation training course within 90 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

Refresher training shall be required whenever the hearing-related PPE or job process changes or after no more than one year.

Hearing protection tools shall be 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 and shall wear appropriate hearing protection in all areas as required by signage, JSA, or PPE Matrix.

2.24 Hand-Carrying Resupply Items:

When preparing luggage for hand carrying, this operating procedure shall be followed.

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- **Prior to Packing:** Before packing, all items shall be inspected and confirmed non-hazardous/dangerous goods according to the SDS provided by the vendor/shipper: Once confirmed non-hazardous, all items shall be inspected as a whole package to ensure no dangerous interactions between items.
- **Packing:** Once all items are confirmed safe to fly, items shall be packed in luggage with protective packing material to ensure their integrity during travel. All batteries shall have contacts covered. Multiple batteries shall not be packed together in inner containers. All electrical devices shall be tested to ensure there is no active current. Any materials that require an SDS shall have the sheet printed and accompanying the item. Contents shall be secured inside luggage to ensure shifting during travel will not compromise any items.
- **Inspection:** After packing is complete, luggage pieces shall be weighed to confirm they each meet requirements and shaken to simulate travel movement. The packer shall then confirm contents are still properly protected. A commercial invoice that identifies and values each item shall be created for customs. Finally, packer shall complete the Hand Carry Checklist with the hand-carry courier. This checklist shall be signed by both the packer and the carrier.
- **Delivery:** Upon arrival at the vessel, the hand-carry courier shall give a copy of the signed resupply luggage and checklist to the Chief Mate, who shall save a copy of the checklist and invoice in the ship's records and send a message to the Resupply team that the luggage was delivered. The Chief Mate shall be responsible for distributing the items to the proper vessel departments.

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