

Manual Section 1	Issue Date 07/15/04	Revision Date 06/15/21	Policy Number LLCP-009
	<b>Subcontractor Management</b>		

### **Purpose**

The purpose of this program is to ensure that our Company continues to improve subcontractor health, safety and environmental performance and to establish a standard for pre-qualification, evaluation/selection and development of our subcontractors.

Third parties doing work in the Company’s behalf are critical to the success of the Company and must perform in a manner that is consistent and compatible with Our policies, procedures, and business objectives.

Preferably, we would like all Subcontractors to be chosen from ISNet World. However, when situations arise and a Subcontractor is chosen and does not subscribe at the time, we would like for all new Subcontractors to start the subscription process with ISNet World. This will allow Corporate HSE to communicate to in-house personnel if the Subcontractor falls short and the needs to have that particular Subcontractor work for our Company.

### **Scope**

All LLC Companies including, Blanchard Industrial, LLC, GIS Engineering, LLC, Grand Isle Shipyard, Inc., and GWIS, Mack Steel, NuWave, Sun Industries; hereafter identified as “Company”.

### **Expectations**

Safety is a prime consideration in all operations, including working with Sub Contractors. The detailed means employed by the independent contractor to meet that end are the responsibility of the contractor.

While working for the company, the contractor is responsible for abiding by the company’s HSE requirements. Nothing stated or implied in these safety rules shall be construed to make a contractor an employee of the company or any of its affiliates.

### **Sub-Contractor Responsibilities**

Sub-Contractors are responsible for

- Ensuring the safety of their employees while working for and/or at company facilities.
- Ensuring that their employees are familiar with the work to be done and applicable emergency response plans.
- Training their employees in all areas necessary to ensure safe operations, and
- Ensuring that their employees have and utilize all necessary personal protective equipment, and other safety equipment.

### **Sub-Contractors performing work for the company or at our facilities shall:**

- Comply with applicable health and safety laws and regulations.
- Adopt safety practices equivalent to or exceeding those applicable to company employees.
- Ensure that all machinery and equipment is maintained in safe running order, and inspected regularly to ensure safe, continued operation.
- Report all on the job contractor injuries, accidents, and near misses to the company representative as soon as possible on the same date of the occurrence.
- Participate in investigations of injuries, accidents, and near misses, which occur on company jobs.

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**Pre-entry requirements at a minimum include:**

- ISN Subscription
- HSE questionnaire / screening
- insurance verification / certificates on file
- hold harmless agreement on file
- negative drug screen verification on file
- comparable employee orientation
- company contractor orientation
- spill prevention control and counter measures form completed and on file
- employee HSE acknowledgment form signed and on file

**Summary**

Above is only a high-level overview of our Subcontractor Management. For specifics, please contact the Corporate HSE department or Legal department for a copy of our complete Subcontractor Management Program.