Purpose

This document establishes an environmental management program for the 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".

Applicability

This Directive applies to all company organizational elements and facilities.

Policy

All Company employees must be committed to protect, preserve, and enhance the quality of the work environment while conducting their primary activities. Company environmental includes the soil, water, air, and natural habitat within and around all facilities and boundaries. The Company Environmental Management Program is built around three of the four areas: prevention, compliance, conservation and restoration.

The Company will conduct business in an environmentally responsible manner, optimize the use of resources through the use of efficient technologies and procedures; prevent adverse impacts; and comply with applicable requirements. The Company will actively support efforts to implement environmental policy, programs, initiatives, and activities. The Company will integrate environmental stewardship and accountability in the performance of its operations and activities to promote continuous improvement of environmental performance.

Company objectives are to prevent adverse environmental effects and to realize the benefits of superior environmental performance. To attain these objectives, the Company will use risk management, pollution prevention, and sustainable development techniques to improve environmental performance and reduce operating costs.

Responsibilities

It is the responsibility of every Company employee to comply with Federal, State, and Local environmental regulations.

- **Management:** Management is responsible for all environmental compliance activities at all Company facilities.
- **Corporate HSE Director:** The Company focal point for environmental activities, the HSE Director has overall environmental responsibilities. The HSE Director's task is to ensure continual surveys, reviews, and evaluations of environmental activities at all levels throughout the Company are conducted. Under this authority, the HSE Director has authority for approval or cessation of all phases of acquisition and operation of hazardous facilities, systems, or equipment for non-compliance activities.
- Facility Managers: Managers of Company facilities shall ensure that internal organizational plans and procedures are maintained to implement and comply with the Federal, State, and local environmental laws and regulations.