

Manual Section 7	Issue Date 07/05/09	Revision Date 06/15/21	Policy Number LLCP-081
	HSE Management System		

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”.

Our Company HSE Management Plan is organized and developed using the management philosophy of *Plan, Organize, Develop, Implement and Evaluate*. After evaluation, the item is either maintained or revised, and the cycle begins again. This management philosophy is used for every component within the Company HSE Management System. It is shown below in a cycle format so that you can see the flow and the relationships.



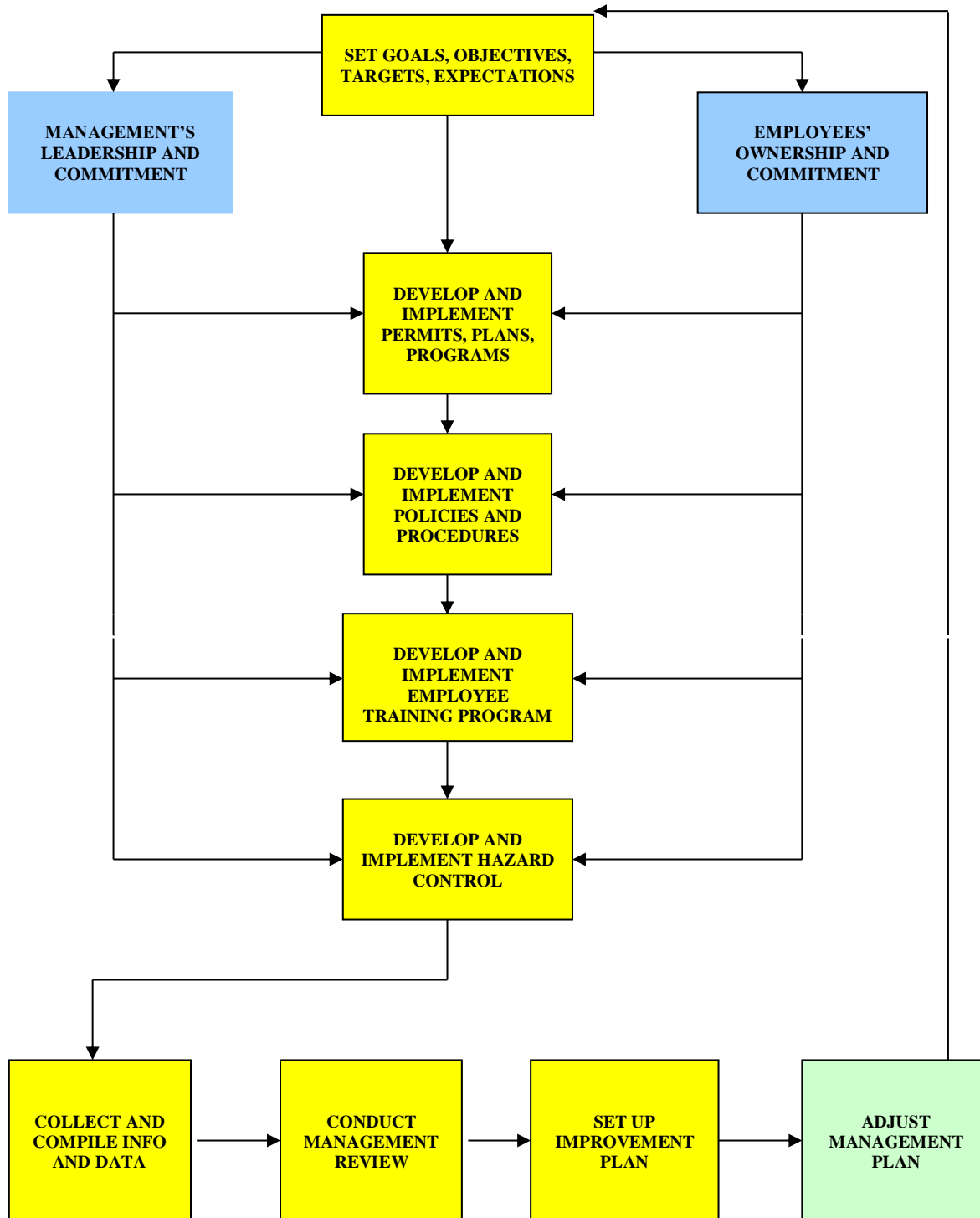
The Company approach to the control of its Management System is to first key in on the critical HSE elements that are required to put us into **compliance**: for example, Permits, Plans and Programs. From here, Policies and Procedures are developed to **implement** the Plans and Programs, and then employees are trained in the various components. The effectiveness of the System is determined through Hazard Control, Leadership and Commitment, and Employee Ownership and participation. The Ten Elements that make up the HSE Management System are:

1. **Leadership and Commitment**
2. **Plans and Programs**
3. **Employee Ownership and Participation**
4. **Policies and Procedures**
5. **Occupational Health Program**
6. **Hazard Control**
7. **Training**
8. **Audits and Inspections**
9. **Contractor Safety**
10. **Planning and Performance Review**

Note: Roles and Responsibilities of Executives, Managers, Supervisors and Employees are incorporated into each component of the Management Plan rather than presenting them separately.

The process used to manage the HSE Management System on an annual basis is shown on the Flow Chart on the next page.

**FLOW CHART
HSE MANAGEMENT PROCESS**



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Element 1

Leadership and Commitment

Management leadership and commitment is the foundations that provide the resources and motivation for controlling all organizational activities. In an effective safety and health program, management regards safety as a core organizational value, and communicates its commitment to safety and health as it does for all other organizational functions. Visible top management involvement is foremost. Actions speak louder than words. When all levels of management give high priority and attention to safety and health protection, organizational safety expectations are raised and achieved.

Leadership and commitment are demonstrated in many ways; the Company Executives, Managers and Supervisors have individually and personally committed to the statements within the HSE Policy. In addition to the HSE Policy Statement, management personnel individually and personally pledge to communicate all aspects of the HSE Management System to employees at all levels, to recognize best practices performed by employees, to monitor HSE activities to ensure application, to support the their Department in its efforts to improve the health and safety of its employees, and to consistently apply HSE standards and guidelines to all employees in all situations within the company.

Management individually and personally pledge to be visible regarding health, safety and environmental activities by attending safety meetings, making informal walk-throughs at the Company facilities and at customer locations, to attend training sessions, to promote safety and health issues in writing, to verbally encourage safety when talking with employees and customer personnel, and to stimulate and motivate employee ownership and participation in all aspects of the Health, Safety and Environmental Management System process.

Procedure

Managers and supervisors drive the process for HSE excellence; all levels of management own the HSE management process. Leaders actively participate in HSE activities, jointly develop and discuss HSE results and activity improvement targets with employees regularly. Managers and supervisors must accomplish the following:

1. Verify that all Company employees are aware and understand the HSE Policy Statement.
2. Present and discuss HSE goals and targets, the roles and responsibilities of each employee, and the HSE Policy Statement in January of each year with all employees; document the event and any feedback received during the event.
3. Attend at least one safety meeting each month to stimulate and motivate employee ownership and participation regarding current HSE activities; document any feedback received during the meeting.
4. Conduct at least one walk-through of the workplace each month to promote health and safety of the employees; document any feedback received during the walk-throughs on the Company Observation form.
5. Review company Permits, Plans, Programs, Policies and Procedures quarterly to identify changes, additions or deletions, according to the *Permits, Plans, and Programs* and *Policies and Procedures* sections of the HSE Management Plan, and support the their Department's efforts to get employees involved in the development and implementation of these documents.

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6. Review 90 day training reports monthly and support their Department's efforts to train all employees according to the *Employee Training* section of the HSE Management Plan.
7. Monitor all hazard identification and abatement activities (Weekly Inspections, JSEAs, Incident Reporting and Investigation, and Management of Change) according to the *Hazard Control* section of the HSE Management Plan and encourage non-participants to get involved; document results from effort.
8. Convey all employee comments, recommendations, learnings and best practices to Corporate HSE Department in writing.
9. Model (by example) best practices when attending safety meetings or conducting walk-throughs (wear proper PPE, exhibit safe behavior, etc.).
10. Verbally support Company philosophy and benefits associated with the HSE Management System.
11. Support and assist the activities of the HSE Management Team in the managing of the HSE Management System.
12. Support and assist the HSE Management Team in achieving an above average score on the Company Self-Assessment and on each of the customer annual audits performed during the year.
13. Support and assist the HSE Management Team and the company in obtaining an OSHA Rate goal for the year.

Each Executive, Manager and Supervisor is encouraged to set personal goals and targets for their departments and personnel, present these goals and targets to their personnel, and accomplish them during the year. These departmental goals and targets should be shared with others (to gain support and encouragement); the results should be measured, documented and presented to upper management at the end of the year.

- Man Hours
- Non-Industrial Incidents
- First Aids
- Recordables

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Element 2

Plans and Programs

Federal and state governments require companies to develop and implement specific written Plans and Programs regarding the work they perform. In addition, some customers require companies to develop and implement specific programs regarding their working relationships. The HSE Management Team, has a role and a responsibility to ensure that our Company is in *compliance* with these requirements, that its Plans and Programs are *implemented*, and that these Plans and Programs are *effective* in helping to achieve its HSE goals and objectives.

The Corporate HSE Director, and their Department personnel regularly monitor and review the regulations and standards (Federal Register, Codes of Federal Regulations, Recommended Practices, Industry Guidelines, etc.) and the Customer’s requirements regarding updates and new work-related Plans and Programs by reviewing trade journals, attending professional and organization meetings, subscribing to information distribution and notification systems, surfing the web, and/or communicating with Company Customers to proactively achieve compliance. The HSE Director and their Department shall monitor and review existing Plans and Programs in every day applications via safety meetings, observations, field visits, training, documentation, etc. to ensure that these Plans and Programs are effectively addressing their respective work-related activities.

When a member of the HSE Team discovers the publication of a new regulatory Plan or Program requirement, a customer’s need for a new Plan or Program, the need for a regulatory or customer update to an existing Plan or Program, or a problem or discrepancy with an existing Plan or Program that warrants correction, a member of the HSE Team will collect and prepare the appropriate information to present to the HSE Director at the next regularly scheduled HSE Team meeting:

- Brief description of the new Plan or Program, the update or the problem/discrepancy.
- Reason for the action regarding the new Plan or Program, update or problem/discrepancy.
- How and when the action should be accomplished.
- Who should be responsible for accomplishing the action?

The HSE Management Team will meet, review and discuss the information with the HSE Director, and talk about the steps and processes that are necessary to accomplish the action. If a determination is made “not to take action”, the HSE Director is so instructed, and the issue dies. If the determination is made to “take action”, the Team discusses an action plan, organizes the steps to accomplish the plan, and accepts to take action from the HSE Director. All actions shall be documented it in the HSE Management Team Minutes.

- If there is a problem, discrepancy, or an update for an existing Plan or Program, the HSE Team makes the appropriate edits and/or submits the revisions to the other members of the their Department for review and/or to the HSE Director for approval.
- If a new Plan or Program needs to be developed, the HSE Director (or his delegates) develops the program and/or submits it to the other members of his their Department for review and/or to the HSE Director for approval.

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Once the new Plan or Program is developed and approved, or a previous plan edited and approved, the HSE Director implements it by distributing it to all Asset Managers and Supervisors and by posting it on the “Safety Portal” link via the GISY website.

The HSE Team makes a report at the next regularly scheduled HSE Team meeting immediately following implementation of the Plan or Program; the completion of the action item is properly documented in the minutes of the meeting.

Procedure

The following procedure reflects the steps the HSE Management Team and the HSE Director will take to effectively manage the Plans and Programs section of the HSE Management Plan:

1. HSE Director and their Department personnel review regulations and standards and check with customers’ to determine if any new Plans or Programs are required.
2. HSE Director and their Department personnel monitor and review existing Plans and Programs in every day applications to ensure effectiveness.
3. When HSE Management Team discovers a new Plan or Program requirement or need for an update, HSE Management Team collects and prepares appropriate information to present to HSE Director at next regularly scheduled HSE Team meeting.
 - Brief description of new Plan or Program, update, or problem or discrepancy.
 - Reason for action regarding new Plan or Program, update or problem or discrepancy.
 - How and when action should be accomplished.
 - Who should be responsible for accomplishing the action.
4. HSE Management Team will meet, review and discuss information about steps and process necessary to accomplish action.
5. If determination is made “not to take action”, issue dies.
6. If determination is made to “take action”, the HSE Team generates action plan, organizes steps to accomplish plan, and takes appropriate action, and then documents action item in minutes of meeting.
7. HSE Management Team develops new Plan or Program or edits existing Plan or Program and submits to their Department personnel for review and/or HSE Director for approval.
8. HSE Director implements Plan or Program or its updated sections by distributing it to Asset and by posting on “Safety Portal” link via GISY website.
9. If necessary, HSE Director schedules training related to new Plan or Program or updated sections of the existing Plan or Program.
10. HSE Director makes status report at HSE Team meeting immediately following implementation of Plan or Program; status is documented on Document Control Tracker.

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11. Every quarter, HSE Team conducts a review of implementation process to determine if all employees received announcement or training associated with a new Plan or Program or update of existing Plan or Program.

A new Policy and Procedure is generated for each new Plan or Program and the existing Policy and Procedure is edited for each existing Plan or Program, and presented to all employees in conjunction with this section of the Management Plan (see Policies and Procedures).

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Element 3

Employee Ownership and Participation

Ownership and participation provide the opportunity through which workers harmoniously identify hazards, make recommendations, take corrective actions, and participate in programs and activities for their health and protection. An effective health, safety and environmental program depend on employee ownership and participation, and the corresponding commitment to consistently demonstrate these traits while in the workplace. Management Systems should be established to support the transfer and sharing of health, safety and environmental ownership and participation to all employees.

The Company encourages participation of its employees in a variety of ways, and we are always searching for new ways to involve them. Employees participate in the implementation of all Company Permits, Plans, Programs, Policies and Procedures (refer to Management Plan). Employees are trained in all applicable government, company and customer programs and procedures to ensure that they are competent and have the skills and knowledge to participate in the various operational activities associated with performing work for the company and for our many customers. During these activities, employees are encouraged to make comments about the manner in which the information is presented or prepared, and this feedback is relayed from the employee to the respective Supervisor or Operations Quality Representative to the Corporate their Department or to the Corporate HSE Director for incorporation into future changes, additions or deletions dealing with the particular information.

Employees are involved in all aspects of our Hazard Control activities: Weekly Inspections, JSEAs, Incident Reporting and Investigation and Management of Change. In each instance, employees participate in the identification of hazards and behaviors and the correction of these hazards and behaviors according to the respective programs. Feedback from all employees is solicited to ensure that the Hazard Control activities are identifying and correcting the hazards or conditions before incidents occur and before employees are injured.

Employees participate daily in safety meetings with co-workers, customers and other contractor personnel. During this time, employees discuss safety issues and prepare to work safely. From the documentation of these meetings, information concerning learnings and best practices are extracted through regular review by Operations Quality Department personnel and reviewed by Corporate their Department. Valid information is then incorporated into specific applications to improve the overall safety and health of personnel in the future.

Competency is checked periodically by Division Managers and Supervisors, as well as the Operations Quality Department, using comprehensive HSE observation checklists and tests to measure skills and knowledge, as well as application for a particular HSE concern (for example, all requirements associated with Personal Protective Equipment are checked/observed). These checklists and tests are turned in and evaluated to determine whether or not the **proactive** training programs and implemented procedures are accomplishing what they are intended to accomplish.

When the information collected from these activities is deemed to be worthy of distribution, the information is distributed through safety meetings, pay envelopes, the newsletter, GISY website, etc. or incorporated within a procedure or training session. Reviews of this documentation are made periodically to ensure that all employees receive the information and understand it.

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If the information collected impacts a published document, the Corporate HSE Director handles it according to the proper section within the HSE Management Plan.

Employees, Supervisors and Managers are surveyed regularly at three different levels (Front-Line Supervisor Assessment, Mid-Level Managers Management Assessment and Senior Manager Leadership Assessment) to determine what their perceptions are regarding the implementation and effectiveness of the HSE Management System, and to determine whether or not the managers and supervisors have ownership in the processes. This information is used by the HSE Management Team in its annual Management Review, to help determine how to effectively approach the implementation of a particular activity.

In the first quarter of each year, employees are made aware of the results of the previous year's HSE efforts and the goals and targets established by the HSE Management Team for the upcoming year. At this time, the results and goals and targets are presented by supervisors and discussed with employees, and determinations are made concerning the commitment by each regarding their respective roles and responsibilities to help the company accomplish its goals and targets. The HSE Policy Statement is also presented (with any updates) and discussed to enable each employee to understand the overall direction and focus of the Company Health, Safety and Environmental efforts for the upcoming year. Some employees are even singled out to participate in the Improvement Plan that results from the annual Management Review, to correct and improve the HSE Management System.

Procedure

The Corporate HSE Director, managers and supervisors, and key individual employees together coordinate and implement the following to monitor, support and encourage ownership and participation, in their respective capacities, among all employees within the company.

1. Verify that all employees are participating in the implementation of all Permits, Plans, Programs, Policies and Procedures.
2. Verify that all employees are being trained in all government, company and customer required programs.
3. Identify employee comments, recommendations, learnings and best practices regarding items in steps #1 and #2; document who they are and what feedback they are providing.
4. Verify that all employees are participating in the Hazard Control activities.
5. Identify employee comments, recommendations, learnings and best practices regarding items in steps #4; document who they are and what feedback they are providing.
6. Verify that all employees are participating in safety meetings; document any learnings and best practices resulting from employee participation (meeting minutes).
7. Corporate HSE will verify that various employees are assessed on at least one HSE item during the year; document the name, item and results of the assessment on the facility audit form.

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8. Verify that the method of communicating information and data resulting from these activities is effective and efficient, and employees are more aware of the various aspects of the HSE Management System each year (improvement).
9. For those employees not participating in a particular activity, take the necessary steps to motivate and stimulate their participation; document the results.
10. Verify that the goals and targets, the roles and responsibilities of each employee, and the HSE Policy Statement are presented and discussed in January of each year to all employees; document the event and any feedback provided by the employees during this event.
11. Collect and compile the information and data associated with these activities and present them to the HSE Management Team at the annual meeting.

The results of the surveys identify the perceptions of the employees, managers and supervisors, and whether or not these groups feel ownership of and participation in the HSE Management System, and the HSE activities and efforts provided by the company, and whether or not the Corporate HSE Director, managers and supervisors are fulfilling their commitment to encourage and support health, safety and environmental ownership and participation among the employees.

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Element 4

Policies and Procedures

The Company has elected to develop and implement specific written Policies and Procedures regarding the Plans and Programs they have in place and to develop and implement other specific written Policies and Procedures for the work and activities being performed by its employees in the workplace. The Corporate HSE Department has a role and responsibility to ensure that the Company implements these Policies and Procedures associated with its Plans and Programs and the work and activities being performed.

The Corporate HSE Director, and the Corporate their Department team, regularly monitor and review the regulatory agencies' requirements and customers' requirements regarding updates and new work-related Policies and Procedures. The Corporate HSE Director and his Corporate their Department monitor and review existing Policies and Procedures in every day applications via safety meetings, observations, field visits, training, documentation, etc. to ensure that these Policies and Procedures are accurately and effectively addressing their respective work-related activities.

When the Corporate HSE Director or the Corporate their Department team discover the need for a new Policy and Procedure, the need for a regulatory or customer update to an existing Policy and Procedure, or a problem or discrepancy with an existing Policy and Procedure that warrants correction, the Corporate HSE Director collects all of the appropriate information, considers the need for a new or updated Policy and Procedure, and makes a determination. (Note: The removal of an existing Policy and Procedure would essentially be accomplished in the same manner.) If the determination is "not to take action", the Corporate HSE Director takes no action, and the issue dies. If the determination is "take action", the Corporate HSE Director takes the following action:

- If a problem or discrepancy or an update for an existing Policy and Procedure, the Corporate their Department makes the appropriate edits and/or submit(s) the revisions to the Corporate HSE Director for review and approval.
- If a new Policy and Procedure needs to be developed, the Assistant HSE Director develops it and/or submit(s) it to the Corporate their Department for review, then to the Corporate HSE Director for review and approval.

Once the new Policy and Procedure is developed and approved or the edits are made and approved to an existing Policy and Procedure, the Corporate HSE Director implements it by distributing a Policy Update to all Asset Managers, by presenting it to all employees in safety meetings or training sessions, and by posting on the "Safety Portal" link via the GISY website. The Corporate HSE Director gives a report regarding the Policy and Procedure at the next regularly scheduled HSE Management Team meeting following implementation of the Policy and Procedure.

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Procedure

The following procedure reflects the steps the Corporate HSE Director and/or a review committee takes to effectively manage the Policies and Procedures section of the HSE Management System:

1. Corporate HSE Director and Corporate their Department personnel continuously monitor and review existing Plans and Programs to determine if any changes to the respective Policy or Procedure are required.
5. Corporate HSE Director and Corporate their Department personnel continuously monitor regulatory agency and customer requirements to determine if any new Policies and Procedures are required.
6. Corporate HSE Director and Corporate their Department personnel monitor and review existing Policies and Procedures in every day applications to ensure effectiveness, efficiently and safety.
7. When Corporate HSE Director discovers a new Policy and Procedure requirement or need for an update, Corporate HSE Development Advisor collects and prepares appropriate information to consider and make a determination to take action or not to take action.
8. If determination is made “not to take action”, issue dies.
9. If determination is made to “take action”, Corporate HSE Director develops new Policy and Procedure or edits existing Policy and Procedure and/or submit(s) to a review committee for review and approval.
7. Corporate HSE Director implements Policy and Procedure or its updated sections by distributing it to Asset Managers, and presenting it to all employees at safety meetings (with proper documentation), and by posting it in the “Safety Portal” link via the GISY website.
8. If necessary, Corporate HSE Director schedules training related to new Policy and Procedure or updated sections of existing Policy and Procedure (with proper documentation).
9. Corporate HSE Director makes status report at HSE Management Team meeting following implementation of Policy and Procedure; status is documented on Document Control Tracker.
10. Every quarter, Corporate HSE Director conducts a review of the documentation of the implementation process to determine if all employees received presentation and/or training associated with a new Policy and Procedure or update of existing Policy and Procedure. If employees have not received Policy and Procedure information, steps 7-8 should be repeated for those employees.
11. Every three years confirms that a new HSE Manual is built in its entirety. Policies are to be updated in the current manual during the three-year period and tracked on the Document Control Tracker.

The implementation of Policies and Procedures is the most effective manner in which to communicate information to employees relating to Plans and Programs and work and activities.

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Element 5

Occupational Health

Employee Assistance Program

The Company recognizes that a wide range of issues not directly related to work can have a profound impact on job performance. In most cases, the employee can work through such problems independently and the effect on job performance is minimal. In other cases, normal supervisory assistance will serve either as motivation or guidance by which such problems can be resolved and job performance will return to an acceptable level. In some cases, however, neither the effort of the employee or the supervisor has the desired effect of resolving the employee's issues. Continued unsatisfactory performance persists over a period of time, either constantly or intermittently.

We believe it is in the interest of the employee and the employee's family to provide an employee service that deals with such persistent problems. Therefore, it Company policy to handle such problems within the following framework:

1. The Company recognizes that almost any personal problem can be successfully treated provided it is identified in its early stages and referral is made to an appropriate method of care. This applies whether the problem is one of physical, mental or emotional illness, finances, and marital or family distress, alcoholism, drug abuse, legal problems or other personal concerns.
2. When an employee's job performance or attendance is unsatisfactory, and he/she is unable or unwilling to correct the situation, either alone or with normal supervisory assistance, this is an indication there may be some cause outside the workplace that is the basis of the problem.
3. If such personal problems are the cause of unsatisfactory job performance, they will receive careful consideration, and an offer to help resolve such problems in an effective and confidential manner.
4. Employee's problems causing unsatisfactory job performance will be handled in a forthright manner within the established employer's health and personnel administrative procedures. All records will be preserved in the highest degree of confidence.
5. If necessary, sick leave may be granted for treatment or rehabilitation on the same basis as is granted for ordinary health problems.
6. Employees are encouraged to voluntarily contact the Employee Assistance Program (EAP); to seek confidential counseling and information regarding problems that they feel may affect their work performance.
7. Employees referred through the program by their supervisor may be required by the EAP Professional to secure adequate medical, rehabilitative counseling or other services necessary to resolve the problem.

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8. It will be the responsibility of the employee to comply with the referrals for assessment of his/her problem and to cooperate and follow the recommendation of the Employee Assistance Professional. An employee's continued refusal to accept the EAP recommendations will be handled by dealing with the job performance problem according to normal disciplinary procedures.
9. Since employee work performance can be affected by the problems of an employee's spouse or other dependents, the program is available to the families of our employees as well.
10. Utilizing this service will not jeopardize an employee's job, future or reputation.

Employees and their household members may use EAPs to help manage issues that could adversely impact their work and personal lives. EAP counselors typically provide assessment, support, and if needed, referrals to additional resources. The issues for which EAPs provide support vary, but examples include:

- Substance Abuse
- Safe working environment
- Emotional distress
- Major life events, including births, accidents and deaths
- Health care concerns
- Financial or legal concerns
- Family/personal relationship issues
- Work relationship issues
- Concerns about aging parents

The Company's EAP's service, "Initial Consultation", is covered for the employee or household member, having been pre-paid by the employer. Confidentiality is maintained in accordance with privacy laws and professional ethical standards. Employers do not know who is using their employee assistance programs; unless there are extenuating circumstances and the proper release forms have been signed. In some circumstances, an employee may be advised by management to seek EAP assistance due to job performance or behavioral problems. In fact, the goal of these supervisory referrals is to help the employee retain their job and get assistance for any problems or issues that may be impacting their performance. And, most importantly, any referrals for job performance issues or concerns are always confidential.

Policy

It is Company Policy that all employees of the Company must be notified of our Employee Assistance Program. The employee must be advised of the benefits of the program and of the method used should he/she needs to contact the EAP. Any and all employees who may contact the EAP shall be kept confidential unless the notification poses a direct threat to an employee, person, facility, etc.

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Procedure

In order for an employee to contact the Company EAP, he/she must call the allocated (800) number and speak with an EAP Representative. From that point, the trained representative will decide what services he/she would need and the location of the employee's next consultation, given that one should be necessary.

Medical Evaluation

The Company conducts pre-hire medical evaluations to minimize the possibility of unfit personnel in job functions. These medical evaluations are conducted to ensure that any employee working for the Company has the capabilities to perform any task that he/she may be directed to perform while being employed by the Company, according to the Company's Fit For Duty Policy.

This screening process will provide our employees with the minimum standard that one shall poses to perform services for the Company.

General

Upon being hired an employee shall undergo a Medical Evaluation. Medical Evaluations may vary depending on what occupation an employee may undertake. Other evaluations may exist depending upon the nature of work an employee is expected to perform or in some cases an employee's job description or title may dictate certain criteria that he/she may have to undertake.

Procedure

All employees working for the Company are to be evaluated of the following:

- Drug & Alcohol Screening
- Spinal Pictorial Evaluation
- Agility Evaluation
- Audiogram
- General Screening by a Medical Professional

Employees who may be exposed to hazardous environments or work conditions and need special criteria are to be evaluated of the following:

- Drug & Alcohol Screening
- Spinal Pictorial Evaluation
- Pulmonary Function Test
- Breathing Apparatus Fit Testing
- Agility Evaluation
- Audiogram
- General Screening by a Medical Professional
- Vision Evaluation

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Industrial Hygiene

General:

These references are intended to address comprehensively the issues of; evaluating the potential hazards, communicating information concerning these hazards, and establishing appropriate guidelines, and protective measures for employees. These guidelines were developed to be used as a reference for field applications and do not supersede or replace any US Production Safety Standards. ALWAYS refer to the appropriate Safety Standard and/or unit operating procedure for detailed work practices and procedures.

The Company acknowledges that our employees may work in hazardous environments and have developed precautions, which are available to all employees, for the following:

- Abrasive Blasting
- Removing asbestos containing insulation and building materials
- Removing asbestos containing gaskets, valve packing and tower tray packing
- Handling streams of >0.1% Benzene
- Working in Excavations
- Heat Stress
- Welding and Thermal Cutting
- Asbestos Insulation Work
- Lead Work
- Painting
- Personal Monitors
- Preparing to send equipment offsite
- NORM
- Silica containing material
- Ventilation
- Equipment/Streams containing Stretford solution (Vanadium)

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Hazard Control

The most effective, proactive approach to eliminating incidents and accidents in the workplace is the identification and abatement of hazards. The Company uses a joint venture approach to the identification and abatement of hazards within our operations, at our facilities and at our customer locations. The joint venture is the conjunction of Corporate HSE department and the Company Operations Quality group.

The manner in which we determine that our efforts are effective is in the reduction of hazards identified in the workplace and a reduction in incidents involving our employees, our environment, and our equipment and operations.

Hazards are identified and abated through various ways, consisting of the following:

- Hazard ID (LAW)
- Work Plan / Safety and Environmental Analyses (JSEA) & Minimum Requirements
- Weekly Inspections
- Management of Change procedure
- Incident Investigation/Root Cause Analysis

Job Safety Environmental Analyses (JSEAs) are used daily to determine the hazards associated with routine and unusual work activities, and eliminate them before the work is performed and before the hazards cause an incident. Operations Quality and especially the Asset Managers and Supervisors must ensure that the JSEAs are completed properly, the “LAW” is utilized and addressed on the JSEA, and all are reviewed and scrutinized carefully with all workers involved in the task(s) to accomplish the desired results.

Every employee has a responsibility to be safe. The Company has generated a **Minimum Requirements** which should be utilized in **conjunction** with the JSEA, to educate all of our employees about correct and incorrect, acceptable and unacceptable, work practices to prevent incidents or actions that most likely result in incidents or accidents. In an attempt to continue to build a positive culture and attitude to improve safety within our workforce, the development of this Inventory is through input and participation of all of the employees from all levels within our organization, and is used to promote and enhance individual and team safety.

Weekly Inspections: The Operations Quality Leadership encourages his team to regularly use the inspection forms, coaches them to learn when and how to conduct the inspections, trains them in how to address discrepancies found during the inspections, and monitors the documentation and elimination/control of the hazards and defects found.

The Corporate their Department ensures that the **Management of Change** process is accomplished according to the procedure, and that these steps are taken to ensure that hazards are not created by the actions of our workers.

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The Corporate their Department ensures that all employees and contract personnel are aware of the process and know what to do and who to contact when any proposed changes or modifications impact the original design, the safety or the control system of any piece of equipment, machinery, procedure or used by the Company. The Corporate their Department also reviews/monitors all of the MOC forms until final closure.

A conjunction effort of Operations Quality and Corporate HSE Management shall perform **Incident Investigations/Root Cause Analyses** once they are notified of the incidents, and attempt to determine the causes (hazards) associated with the incidents. Corporate HSE Director must ensure that all of the people involved in the investigation and analysis process are properly trained in these techniques, can eliminate the causes, and work to prevent these incidents from happening again.

The HSE Administrator provides the HSE Director with information regarding the status and the progress of each of these programs on a quarterly basis:

- A status report on the Work Plan / Safety and Environmental Analyses (JSEA) & Minimum Requirement activity, and a comparison between the incidents reported and the hazards identified on the JSEAs.
- A summary of the Weekly Inspections conducted during the period, number of Inspections conducted, defects and hazards documented, defects and hazards corrected, defects and hazards still outstanding (not corrected), and a comprehensive action plan regarding the outstanding defects and hazards.
- A status report on the Management Of Change program, and any reoccurring discrepancies associated with the equipment and machinery replacement activity.
- A status report on all Incident Investigations/Root Cause Analyses conducted, and a comparison between the causes of incidents and the processes within Hazard Control.

The HSE Management Team shall meet, review and discuss the above information, asks questions regarding the information presented, and talk about the steps that are necessary to correct any hazards (or defects) identified during the presentation. The HSE Management Team also evaluates the success or lack of success of the specific process that is part of Hazard Control, to determine what could be done differently to make the process(es) more effective. Based on this evaluation, the HSE Management Team generates action items that include the following:

- Brief description of what should be done.
- Reason for the action.
- How and when the action should be accomplished.
- Who should be responsible for accomplishing the action.

Under the direction of the HSE Director the HSE Management Team makes the appropriate adjustments to the processes and implements them by distributing the information to the appropriate Asset Managers and Supervisors, and presenting them to all employees at the first available opportunity.

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Procedures

The following procedures reflect the steps the HSE Director, HSE Management Team, Operations Quality, Division Managers and Supervisors, and all employees and contract personnel take to effectively control hazards in the workplace:

Operations Quality shall perform **Risk Assessments**; HSE Administrator monitors the process and reviews at least three Assessments from Operations Quality *monthly*:

1. Verify Safety Supervisors understand procedure and how to conduct Inspections.
2. Verify Safety Supervisors conduct, document, sign and submit weekly inspections; if not, review procedure with Safety Supervisors.
3. Verify defects and hazards are corrected in timely fashion (within 30 days); assist in correcting defects and hazards as necessary.
4. Determine reasons for any defects and hazards not corrected.

Employees (including Supervisors/Division Managers) complete **Work Plan / Safety Environmental Analysis (JSEA) & Minimum Requirements**; Operations Quality monitors process and reviews at least one JSEA from each facility and at least one JSEA from each work project *monthly*:

1. Verify employees understand procedure and how to complete and process JSEAs.
2. Ensure employees fill out JSEAs, review and discuss contents (especially hazards) in pre-job meetings, and have all affected workers sign form.
3. If hazards identified, verify employees eliminate or control hazards before beginning work; determine reasons for any hazards not eliminated or controlled.
4. Verify employees post JSEAs near work area to notify all personnel of hazards.
5. Verify employees generate new JSEAs when conditions require (change).

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Employees and contract persons initiate **Management of Change (MOC)**; Corporate their Department monitors process and reviews at least one MOC *monthly*:

1. Verify all employees and all contract persons understand procedure and guidelines to propose changes and initiate MOCs.
2. Verify Supervisors/Managers can properly determine “Replacement In Kind” RIK and non-RIK.
3. If non-RIK, ensure Supervisor/Manager approves, fills out and signs MOC forms, and places in readily accessible location (with other related documents).
4. Ensure Supervisor/Manager sends MOC form to Corporate their Department.
5. If necessary, verify Supervisor/Manager trains affected personnel prior to start of process or use of equipment.
6. When work completed, ensure Supervisor/Manager sends completed, final form (and all documentation) to Corporate their Department.

Operations Quality and Corporate HSE jointly conduct **Incident Investigation/Root Cause Analysis**; HSE Director monitors process at least *quarterly* and reviews at least one Investigation report *monthly*:

1. Verify employees and contract persons understand procedure and necessity to report all incidents to Management immediately.
2. Verify Supervisors/Managers understand procedure to investigate incidents and conduct cause analyses.
3. Observe investigation/cause analysis conducted by Supervisors/Managers; Corporate their Department personnel provide assistance as necessary.
4. Ensure Supervisors/Managers send Investigation Reports to HSE Director when completed.

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Hazards identified during the completion of a JSEA must be corrected or controlled before work begins; defects and hazards identified during the Weekly Inspections, MOC and Incident Investigation/Root Cause Analysis must be corrected or controlled in a timely fashion. These corrections and controls must be properly documented on the report or on a follow-up report, and reported to the Manager/Supervisor and eventually to the HSE Director. Every defect and hazard must have a cradle-to-grave paper trail.

The Corporate HSE Director and HSE Management Team prepare and present summaries and status reports *quarterly* to the Company President to identify the progress or lack of progress, success or lack of success of the Hazard Control approaches within the Company's operations.

1. Summary of Weekly Inspections conducted during period: number of Inspections conducted, defects and hazards documented, defects and hazards corrected, defects and hazards still outstanding (not corrected), and action plan regarding outstanding defects and hazards.
2. Status report on Job Safety and Environmental Analyses (JSEA) program, and a comparison between incidents reported and hazards identified on JSEAs.
3. Status report on Management of Change program, and any discrepancies associated with equipment and machinery replacement activity.
4. Status report on Incident Investigation/Root Cause Analysis process, and comparison between causes of incidents and processes within Hazard Control.

If the HSE Management Team is concerned with the progress or status of the reported results of any particular approach, the HSE Management Team discusses the concern and directs Operations Quality and/or the their Department to prepare an action item(s) to improve the specific approach(es), and submit that action item to the HSE Director for review and approval at a subsequent meeting.

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Element 7

Training

Federal and State governments require companies to develop and implement specific training to address the work being performed. Customers also require companies to develop and implement specific training to address their working relationships. The Corporate HSE Management Team, and the Training Administrator have the role and responsibility to ensure that Company employees are in **compliance** with these requirements, that the training programs are **implemented**, and that all employees are trained and knowledgeable in all of the required and necessary topics in order to do their jobs in an **effective**, safe and environmentally professional manner.

The Training Administrator, generates a Training Matrix to identify the specific training requirements (what training and how often required) for all Company job positions, from administrative to field personnel, and submits this Matrix to the HSE Management Team and the HSE Director for review and approval. The Training Administrator and the their Department personnel regularly monitor and review work and activities being performed in the field, to determine if the existing training programs need to be adjusted to address specific needs: incidents/accidents continue to occur, discrepancies found in course content, etc. The Training Administrator and the their Department personnel regularly monitor and review the regulatory agencies' requirements, the customers' requirements, and Company requirements regarding Plans and Programs/Policies and Procedures, to determine what specific health, safety and environmental training is required for a particular job position. If a particular job position needs specific training not previously required, or if an existing training program needs significant adjustments to ensure compliance and/or effectiveness, the Training Administrator collects and prepares the appropriate information to present to the HSE Management Team at the next regularly scheduled HSE Team meeting:

- Brief description and cost of new training/significant adjustments to existing training
- Reason for action regarding new or adjusted training material
- How and when action should be accomplished
- If new training, who will be required to complete training
- Who will be responsible for developing/adjusting/providing training

If the Training Administrator obtains approval from the HSE Director, he develops/adjusts the training course or locates a suitable outside training organization, and schedules the training for those affected employees as soon as possible. If necessary, the Training Administrator updates the Training Matrix and distributes it to the appropriate Asset Managers.

Newly hired employees receive **initial training** identified on the Training Matrix. The Training Administrator (or his delegate) conducts the training, gives tests to employees after each topic is covered to verify understanding of the information, issues certificates and cards, properly documents the training on the Training Report to ensure compliance, and places all of the applicable documents in the training file, according to the Training Management System. During this orientation, the new hire presents any certificates/cards regarding previous training he/she received. The Training Administrator collects the certificates/cards, reviews them to make sure the training is current and applicable to Company operations, documents the training on the Training Report, and puts the applicable documentation in the training file.

The Training Administrator (or his delegate) conducts or schedules (with an outside training organization) other required **initial training** not covered during the new-hire orientation but shown on the Training Matrix, based on training needs and work requirements. When the training is complete, the

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Training Administrator issues certificates and cards (or obtains and distributes certificates and cards from the outside training organization), documents the training on the Training Report, and places all of the applicable documents in the training file.

The Training Administrator (or his delegate) conducts or schedules **refresher training** (annual/bi-annual/etc.) according to the frequency established by the standard and the conditions at the time the training is needed. **Re-training** is conducted when incidents occur, when regulatory standards change, or when work conditions change for a particular component, location, task, and/or piece of equipment; or when competency data indicates need.

The Training Administrator (or his delegate) documents the orientation training, any previous training that is still current and is verified with certificates/cards, and any refresher training or re-training that occurred on a **Quarterly** Training Report; the Report identifies which individuals have received what training (and when) and which individuals still need specific training (and when). This Report is used by Division Managers, Supervisors and employees to determine their training status in relation to their obligation to complete all Company -required training within a certain time frame. The Training Administrator reviews this Report frequently to conduct and/or schedule the required training of employees.

Procedure

The following procedure reflects the steps the HSE Management Team, the Training Administrator or his delegate take to effectively manage the Employee Training section of the HSE Management System:

For new training programs or significant adjustments to existing training programs:

1. Training Administrator generates a Training Matrix and submits it to the HSE Management Team and HSE Director for review and approval.
2. Training Administrator, HSE Management Team and the HSE Director shall monitor and review existing Policies and Procedures and the work and activities being performed to determine if adjustments to existing training is needed.
3. Training Administrator, HSE Management Team and the HSE Director shall monitor and review regulatory, customer and Company requirements to determine if new training is needed.
4. If new training requirement or need to significantly adjust an existing training course, Training Administrator collects and prepares appropriate information to present to HSE Management Team at next regularly scheduled meeting:
 - Brief description/cost of new training/significant adjustments to existing training.
 - Reason for action regarding new or adjusted training material.
 - How and when action should be accomplished.
 - If new training, who will be required to complete training.
 - Who will be responsible for developing/adjusting/providing training.
 - Operational Safety will monitor safety training data and implement training as needed.

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5. HSE Management Team shall meet, review and discusses information, asks questions of Training Administrator, and talks about process necessary to accomplish action.
6. If determination is made “not to take action”, issue dies.
7. If determination is made to “take action”, HSE Director so directs the Training Administrator.
8. Training Administrator (or delegate) develops/adjusts training or locates outside training organization.
9. Training Administrator (or delegate) conducts new or adjusted training or schedules new training with outside training organization for affected employees as soon as possible.
10. As needed, Training Administrator updates Training Matrix, and distributes Matrix to appropriate Managers and Supervisors.
11. As required based off of data provided from Competency Assessments, the Operations Safety department will develop and deliver training in coordination with the Training Administrator to ensure adequate knowledge of subject matter is attained by employees.

For all training:

12. Training Reports (90 day reports) shall be generated by Corporate HSE to identify which individuals have received what training (and when) and which individuals still need specific training (and when). Reports will be emailed to the associated Asset Manager monthly.
13. Training Administrator (or his delegate) conducts required **initial training** to all new employees during employment orientation (see Training Matrix); Training Administrator gives tests, scores tests, issues certificates/cards, documents training, updates Training Report, and places all applicable documents in training files.
14. During employment orientation, Training Administrator collects certificates/cards regarding previous training, reviews to determine if current, updates Training Report, and places all applicable documents in training files.
15. Training Administrator (or his delegate) conducts/schedules other required **initial training** for all new employees after employment orientation (see Training Matrix). Training Administrator documents training or obtains documentation, issues or distributes certificates/cards, updates Training Report, and places all documents in training files.
16. Training Administrator (or his delegate) conducts/schedules required **refresher training** of all affected employees (see Training Matrix); Training Administrator documents training or obtains documentation, issues or distributes certificates/cards, updates Training Report, and places all documents in training files.

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17. Training Administrator (or his delegate) conducts/schedules *re-training* of all affected employees as required, when events or changes occur. Training Administrator documents training or obtains documentation, issues or distributes certificates/cards, updates Training Report, and places all documents in training files.
18. Corporate HSE distributes Training Report to Division Managers and Supervisors monthly to update them on the training status of their employees.
19. Training Administrator reviews Training Report frequently to conduct/schedule future training of employees to remain in compliance and to ensure that employees perform their jobs in an effective, safe and environmentally professional manner.
20. Training Administrator submits current Training Report to Corporate HSE Management Team at each regularly scheduled meeting to update them on the training status of all Company employees.

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Element 8

Audits & Inspections

Purpose

The Company conducts Audits and Inspections to ensure compliance with governmental, state, local and company policies and procedures as well as to identify areas of concern or short comings of our HSE Management System. These audits and inspections are the core measuring device and are to be conducted at regular intervals. The results of our Audits and Inspections should be the key indication of how Corporate HSE Management Team focuses its energy to better the Company Safety Management Process.

Audits

Corporate HSE shall conduct audits of the HSE Management System to ensure compliance and to identify gaps that may exist. These audits will be trended and analysis to ensure continual improvement of our System and processes.

Audits are to be conducted either by a systematic process or when an event or incident occurs and deficiencies in a process, policy or program transpires.

Inspections

Corporate HSE, in conjunction with Operations Quality shall conduct inspections on all Company facilities, work locations and work sites. These inspections shall be trended and analysis to identify areas of concern so that remedial actions can begin. All trends and analysis shall be reported to the Corporate HSE department to ensure that remedial actions are in place and that company wide information is shared.

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Element 9

Contractor Safety

The Company upholds the same philosophy for its subcontractors who may work under the direction of the Company, as it does its own employees and that is: “Putting People First”. All contractors who may perform services for the Company must undergo an evaluation process of the company’s safety performance and it’s guidelines before establishing any contract. This evaluation process is the minimum criteria a company shall have in place, before attempting to perform any services for the Company.

The Company’s minimum contractor safety expectations are found at the end of every Master Service Agreement that a contractor company completes prior to obtaining work relations with us. The minimum criteria must be reviewed by Corporate HSE Management Team before any Master Service Agreement is decided on.

All minimum contractor safety expectations shall be scored according to the Contractor HSE Scoring process. This process reveals a general impression of the contracting company’s safety performance which will allow Corporate HSE to develop a strategic plan to assist the contractor to maintain or enhance their current safety process while performing services for the Company.

If a contractor’s score falls below the accepted minimum criteria, a contractor can still perform services for the Company given that both the President of Operations and the Corporate HSE Director endorses the contractor company and supplies an HSE Professional to assist them in their HSE management process. The Operations Quality Professional selected to assist the contractor company shall continually communicate their HSE effectiveness to the Operations Quality Management to ensure that compliance or noncompliance is communicated to the Operations Division Managers. The Division Manager in charge of the contractor will track their HSE performance, as well as their work performance, which will dictate whether or not they will be selected to perform services for the Company in the future.

Specific items that are to be addressed or acquired can be found on the last page of the Company Master Service Agreement.

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Element 10

Performance Review

The planning and performance review process of any Health, Safety and Environmental Management System includes a review of the performance during the previous performance period, identification and consideration of all successes and shortfalls which occurred during the previous performance period, and a determination of the HSE Management Systems' goals, objectives, targets, and expectations for the upcoming performance period. This planning and performance review process involves the HSE Management Team and all of the Asset Managers and Supervisors within the Company. Company HSE Planning and Performance Review include the compliance, implementation and effectiveness of the following components:

- Leadership and Commitment
- Plans and Programs
- Employee Ownership and Participation
- Policies and Procedures
- Occupational Health Program
- Hazard Control
- Training
- Audits and Inspections
- Contractor Safety
- Planning and Performance Review

These are the components which comprise the Company's Health, Safety and Environmental Management System, and these are the components which require goals, objectives, targets and expectations to be determined and measured over the course of a year. These goals, objectives, targets and expectations are then shared with every employee in the company. Each successive planning and performance review results in improvement over the previous review, which will eventually result in a reduction and/or elimination of all incidents, accidents, hazards, and other unsafe behaviors and conditions for the employees of the Company.

The HSE Management Team's goals, objectives, targets and/or expectations specific to the HSE Management System for the each year are identified, by component:

Procedures

The following procedures identify the steps that the Corporate HSE Director, his their Department personnel, and the Training Manager take, by Management System component, to collect and report the performance data and information to the HSE Management Team for a complete year:

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Employee Training

1. Training Administrator reviews the list of government, customer and company required training programs in the *Employee Training* section of this Management Plan; the Training Manager determines which training programs are currently available to employees and which are not.
2. If the training program(s) listed is (are) not available to employees, the Training Administrator makes every attempt to develop and implement the needed program(s) and/or locate a third-party vendor to provide the needed training program(s).
3. If an available, required training program affects employees not trained and/or not refresher trained, the Training Administrator makes every effort to train and/or to refresher train these employees by the end of the year.
4. At the end of the year, the Training Administrator
 - Compares the training programs available to the list of training programs required, and calculates the percentage
 - Compares the actual number of affected employees trained to the number of affected employees required to be trained in the required programs.
 - Compares the actual number of employees tested to the number of affected employees eligible to be tested in the required programs.

Plans and Programs

1. Corporate HSE Development Advisor reviews the list of government, customer and company required plans and programs in the *Plans and Programs* section of this Management Plan; the Corporate HSE Development Advisor determines which plans and programs are currently developed and implemented and which are not.
2. If the plan(s) or program(s) listed is (are) not developed and implemented, the Corporate HSE Development Advisor makes every attempt to develop and implement the needed plan(s) and/or program(s).
3. If a required plan or program affects employees not familiar with the plan or program, the Corporate HSE Development Advisor makes every effort to familiarize these employees with their location and content by the end of the year.
4. At the end of the year, the Corporate HSE Development Advisor
 - Compares the plans and programs developed and implemented to the list of plans and programs required, and calculates the percentage,
 - Compares the actual number of affected employees familiar with the location and content to the number of employees required to be familiar with the location and content of the plan(s) and/or program(s), and calculates the percentage,
 - Presents these percentages to the HSE Management Team at a meeting in the first month of the next year.

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Policies and Procedures

1. Corporate HSE Development Advisor reviews the list of government, customer and company required plans and programs in the *Policies and Procedures* section of this Management Plan; the Corporate HSE Development Advisor determines which policies and procedures are currently developed and implemented and which are not.
2. If the policies and procedures listed are not developed and implemented, the Corporate HSE Development Advisor makes every attempt to develop and implement the needed policies and procedures under the direction of the Corporate HSE Director.
3. If a required policy and procedure affects employees not familiar with the policy and procedure, the Corporate HSE Development Advisor or his delegate makes every effort to familiarize these employees with their location, content and application by the end of the year.
4. Of the employees familiar with these policies and procedures, Operations Quality shall make every effort to observe them demonstrating these policies and procedures by the end of the year.
5. At the end of the year, the Corporate HSE Development Advisor:
 - Compares the policies and procedures developed and implemented to the list of policies and procedures required, and calculates the percentage,
 - Compares the actual number of affected employees familiar with the location, content and application to the number of employees required to be familiar with the location, content and application of the policies and procedures, and calculates the percentage,
 - Compares the actual number of employees observed to the number of affected employees available to be observed in the required policies and procedures, and calculates the percentage, and
 - Presents these percentages to the HSE Management Team at a meeting in the first month of the next year.

Hazard Control

1. HSE Administrator reviews all of the Weekly Inspections, JSEAs, MOCs, and Incident Investigations/Causes Analyses for the current year, and compares the number of defects and hazards corrected within 30 days for each approach to the total number of defects and hazards found for each approach.
2. HSE Administrator calculates these six percentages and presents each of these percentages to the HSE Management Team at a meeting in the first month of the next year.

The Management Team reviews the data and information to determine if these goals, objectives, targets and/or expectations were accomplished or if there were shortfalls, and how significant were the shortfalls. The Team then uses this information to determine the goals, objectives, targets and expectations for the upcoming year, as well as identify any new goals, objectives, targets and/or expectations regarding other HSE issues or activities.