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**Scope**

All GIS Holdings, LLC Companies and affiliates including, Blanchard Industrial, LLC, GIS Engineering, LLC, Grand Isle Shipyard, LLC., GWIS, Mack Steel, NuWave, Valvemax, Discovery Industries, Inc., Global Inspections, LLC, and EIS, hereafter identified as “Company”.

**Overview**

The Company’s SEMS Plan sets out guidance for fulfilling the requirements of U.S. Code of Federal Regulations Title 30 Part 250 (30 CFR 250), Subpart S (30 CFR 250 §§1900-1929) (Regulations As part of these Regulations, the entirety of the American Petroleum Institute’s Recommend Practice 75 (API RP75) has been made mandatory, except where specifically superseded in 30 CFR 250, Subpart S.

This SEMS Plan applies to all facilities on the Outer Continental Shelf (OCS) under the Bureau of Safety and Environmental Enforcement (BSEE)’s jurisdiction on which the Company may provide workers susceptible to the regulation.

According to 30 CFR Part 250, Contractors are not required to have a SEMS Program, however, shall have Safe Work Practices in place and use of them documented. The Company has taken it upon itself to write a SEMS plan and outline the policies and procedures for each of the elements of SEMS. This document was developed to assure Clients that we are aware of the SEMS requirements which Contractors are responsible for in order to support Owner/Operator SEMS Programs. This information is available to our Clients and to BSEE upon request.

**Agreements**

Our Company recognizes that we must operate within the Owner/Operator SEMS Plan and all must understand the expectations regarding safety and environmental management between Client SEMS Plans and our own. In order for all involved to agree in the alignment and utilization of the most applicable practice, formal Bridging Agreements shall be developed and communicated to all employees working at the facility. This will assure that clearly defined roles and responsibilities are understood and followed.

**Objective & Goal**

The Company SEMS Support Plan outlines internal operations which will identify methods, processes or procedures which our family of business units requires employees to abide by, to meet and support Owner/Operator offshore SEMS Programs.

The goal of the SEMS Support Plan is to promote safety and environmental protection by ensuring all personnel aboard an offshore facility are complying with the policies and procedures identified in our clients SEMS Program and our SEMS Support Plan. It is also a Company objective to ensure all personnel involved with client SEMS programs must have the necessary skills and knowledge and proper safety training to perform their assigned duties.

To accomplish this goal, we will ensure our SEMS Support Plan identifies, addresses, and manages safety, environmental hazards, and impacts as applicable to job sites.

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## Responsibilities

Our Company vision is founded on principles of people and the environment. To achieve this vision, our everyday goal is to send everyone home as healthy as they were when they arrived for work.

This SEMS Support Plan combines various programs and requirements into a single integrated continuously improving management plan. Management is responsible for ensuring each of the elements identified in the program are implemented while personnel are on offshore client facilities. Executive Management will establish goals and performance measures, demand accountability for the implementation of and provide necessary resources for carrying out an effective SEMS Support Plan. Also, management shall require the elements of the SEMS Support plan are properly documented and available at all office locations. Management shall also communicate the program requirements to all affected employees.

Company Management is familiar with SEMS regulations and shall have safety and environmental policies and safe work practices in place which are consistent with SEMS regulations and client requirements. All policies and safe work practices will be available to operator clients at all times. As a united family of business units, we are committed to providing safe and quality services while requiring the following:

1. Employment of suitably trained and qualified personnel to manage all aspects of the SEMS program;
2. Utilization of personnel with expertise in identifying safety hazards, environmental impacts, optimizing operations, developing safe work practices, developing training programs and investigating incidents;
3. Verification of management of safety hazards and environmental impacts as an integral part of the design, construction, maintenance, operation and monitoring of each job site;
4. Maintenance of the SEMS Support Plan with periodic audits to ensure effectiveness (by addressing the possible need for changes to policy, procedures, objectives, and other elements of the program in light of program audit results, changing circumstances and the commitment to continual improvement) and documentation of observations, conclusions and recommendations of the audit.
5. Development and endorsement of a written description of safety and environmental policies and organizational chart or list of the job titles/roles in the company structure which define responsibilities, authorities, and lines of communication required to implement the SEMS Support Plan.

## SEMS Requirements

The SEMS Regulations enumerate 13 different elements that must be implemented as part of a SEMS program, as well as specific requirements that must also be put into practice. This SEMS Plan outlines the requirements for the 13 elements of SEMS and how GOM generally addresses these requirements. The 13 elements of SEMS are:

1. General Provision
2. Safety and Environmental Information
3. Hazards Analysis
4. Management of Change
5. Operating Procedures
6. Safe Work Practices
7. Training
8. Assurance of Quality and Mechanical Integrity of Critical Equipment
9. Pre-Startup Review

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10. Emergency Response and Control
11. Investigation of Incidents
12. Audit of Safety and Environmental Management Program Elements
13. Records and Documentation

### **Communication of SEMS Plan**

The SEMS Plan describes in general the processes, procedures and standards within the Company that align with Customer's SEMS requirements.

### **Element 1: General Provisions**

The General Provisions element establishes the requirement to develop, implement and maintain a SEMS. It also establishes the objectives Customers' program, management's commitment to SEMS policies, and the overall scope of the SEMS program.

#### **1.1 Applicable Regulations:**

- 30 CFR 250.1900-1904, 30 CFR 250.1909
- API RP75, Section 1

#### **1.2 Specific Requirements:**

Corporate HSE is responsible for the development, support, continued improvement, and overall success of the SEMS program. The SEMS program must include requirements to:

- 1.2.1 Establish goals and performance measures, demand accountability for implementation, and provide necessary resources to carry out the SEMS program.
- 1.2.2 Review the SEMS program at specified intervals (at least annually) to determine if it continues to be suitable, adequate, and effective. Document the observations, conclusions, and recommendations of that review.
- 1.2.3 Utilize personnel with expertise in identifying safety hazards, environmental impacts, optimizing operations, developing safe work practices, developing training programs and investigating incidents.
- 1.2.4 Ensure that management of safety hazards and environmental impacts is an integral part of safe work practices.
- 1.2.5 Ensure that trained and qualified personnel are employed to carry out all aspects of the SEMS program.
- 1.2.6 Ensure that the SEMS program is maintained and kept up to date by means of periodic audits to ensure effective performance.

### **2.0 Element 2: Safety and Environmental Information**

The Safety and Environmental Information element establishes the types of safety and environmental information that should be developed and maintained for any facility or equipment that is encompassed by the regulation, as well as the period for storing such information. Information developed for and used during Hazards Analyses should be considered in determining the extent and detail of required information.

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### 2.1 Applicable Regulations:

- 30 CFR 250.1910
- API RP75, Section 2

### 2.2 Specific Requirements:

Due to the Company being a Contractor as described in 2.1, we have no specific requirements dealing with the facility itself. The Company will however, cooperate with the customer to identify any and all safety and environmental related hazards at all times. Company employees will also review and assure understanding of all mechanical design information, if applicable, such as:

- Piping and Instrumentation Diagrams (P & IDs)
- Electrical area classification drawings
- Equipment arrangement drawings
- Design basis of a relief system
- Description of the alarms, shutdown and interlock systems
- Description of the well control systems
- Design basis for passive and active fire protection features and systems and emergency evacuation procedures
- Information on how considerations of human factors are evaluated during the design or installation of new facilities and major modifications

### 3.0 Element 3: Hazards Analysis

The Hazards Analysis element establishes the need to complete and have current Hazards Analyses for all facilities, the specific elements that should be reviewed during the Hazards Analyses, and establishes the requirements to periodically review and update the Hazards Analyses. It also establishes specific requirements for Job Safety Analysis (JSA), including how long to keep JSAs, specific elements to be covered by JSAs, and how JSAs are approved.

### 3.1 Applicable Regulations:

- 30 CFR 250.1911
- API RP75, Section 3

### 3.2 Specific Requirements:

Customers have implemented hazard analysis at the facility level, and a JSA program for all facilities. Offshore facilities include all types of offshore structures permanently or temporarily attached to the seabed used for exploration, development, production, and transportation of oil, gas, and/or sulfur from areas leased in the Outer Continental Shelf (OCS); they shall be documented and maintained for each operation and task.

The hazard analysis must address the hazards of the operation, previous incidents related to the operation, applicable control technology to the operation, evaluations of potential health and safety effects to employees, and marine environmental impacts in the event of failed control technology.

The facility-level hazard analysis shall be performed by an individual experienced and competent in operations and hazard analysis methodologies. This will not change anything for Company employees.

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We will continue to use the LIFE program as it has been approved by all of our Customers during the audit process of SEMS. JSEA's (JSA's) will be performed on each task as trained on.

3.2.1 Hazards Analysis - We will use the LIFE process and also participate in any other programs required by our Customers.

3.2.2 Job Safety Analysis (JSA) Program - We will continue to use the LIFE process (i.e. JSEA). As discussed in our LIFE Guidance Document and Safe Work Authorization Process, our JSEAs are separated into a series of relatively simple steps; the hazards associated with each step can be identified; and solutions can be developed to control each hazard. The most effective JSEA are those that involve ALL employees. The JSEA shall be signed by all crew members participating in the task signifying understanding and confirming they have the right to utilize Stop Work Authority as stated on every JSEA (watermarked on the document).

3.2.3 JSEA's shall be kept at the jobsite until completion and address, analyze and record potential safety hazards associated with each step.

3.2.4 JSEA's shall record recommended actions to eliminate or reduce identified hazards.

3.2.5 All JSEA's shall be approved and signed off on by the supervisor in charge and PIC of the facility (or appointed representative) prior to starting work.

#### **4.0 Element 4: Management of Change**

The Management of Change (MOC) element establishes the written procedures to identify and control the hazards associated with changes, such as changes in equipment, procedures, materials or personnel. It establishes the changes that will trigger the formal MOC process, as well as the methods by which such formal changes will be initiated, tracked, completed and documented.

#### **4.1 Applicable Regulations:**

- 30 CFR 250.1912
- API RP75, Section 4

#### **4.2 Specific Requirements:**

The Company's MOC procedures have been in place and been approved for use by our Customers. Employee should continue to use the same MOC unless notified by Corporate HSE. Company employees are to also participate and abide by any additional MOC policies Customers may require.

4.2.1 The MOC procedures should include procedures for modifications to:

- Equipment
- Operating Procedures
- Personnel changes (Supervisory)
- Materials
- Operating conditions

4.2.2 MOC procedures do not apply to situations involving replacement in kind.

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4.2.3 Corporate HSE must review all changes prior to their implementation.

4.2.4 The following items must be included in the management of change procedures:

- Technical basis for the change
- Impacts of the change on safety, health and the environment
- Necessary time period to implement the change
- Management approval procedures for the change

4.2.5 Company employees whose job tasks will be affected by a change in the operation must complete a pre-startup review. The change must be documented, employees informed of and trained in the change, and hazard analysis completed prior to startup of the process or affected part of the operation.

4.2.6 If a management of change results in a change in the operating procedures, safe work practices or training, such changes must be documented, dated and retained for a minimum of two years.

4.2.7 Communication of the proposed change to appropriate personnel shall be the responsibility of the MOC Coordinator. All affected employees must sign-off assuring they understand the change prior to continuing work.

## **5.0 Element 5: Operating Procedures**

The Operating Procedures element establishes the need for written operating procedures that provide instructions on how to conduct activities in an efficient, safe and environmentally sound manner. It also establishes the need for a periodic review of operating procedures to ensure that they reflect actual operating conditions.

### **5.1 Applicable Regulations:**

- 30 CFR 250.1913
- API RP75, Section 5

### **5.2 Specific Requirements:**

The Company is classified as a Contractor under the above regulations of section **5.1** of this program therefore Customers must develop a program in which:

5.2.1 Operating procedures include the job title and reporting relationships of the person(s) responsible for each of the facility's operating procedures.

5.2.2 Operating procedures address the following:

- Initial startup
- Normal operations
- Emergency operations
- Normal shutdown
- Startup following a turnaround, or after an emergency shutdown
- Bypassing and flagging out-of-service equipment
- Safety and environmental consequences of deviating from equipment operating limits and steps required to correct or avoid this deviation

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- Properties of, and hazards presented by, the chemicals used in the operations
- Precautions to be taken to prevent exposure of chemicals used in operations to personnel and the environment. These must include control technology, personal protective equipment, and measures to be taken if physical contact or airborne exposure occurs
- Raw materials used in operations and quality control procedures used in purchasing these raw materials
- Control of hazardous chemical inventory
- Impacts to the human and marine environment identified through the hazard analyses.

5.2.3 These Operating procedures should be accessible to all Company employees involved in the operations.

2.2.4 Employees are responsible for following all customer programs in the absence of the Company having a specific program in place. Since this element does not hold the Company responsible to create these procedures, Company employees must assure they understand procedures prior to continuing work.

### **6.0 Element 6: Safe Work Practices**

The Safe Work Practices element establishes the need for a company's safe work practices to limit the risks associated with operational, maintenance and modification activities and hazardous and/or toxic materials and substances. It also establishes the verification requirements for sub-contractors, and the need for the Company to ensure that they are meeting the requirements of the Company's SEMS program.

#### **6.1 Applicable Regulations:**

- 30 CFR 250.1914
- API RP75, Section 6

#### **6.2 Specific Requirements:**

The Company's HSE Manual satisfies the Safe Work Practices element of SEMS. All Company employees are to continue to abide by these policies and procedures at all times while working for the Company on or off of Customer property. This is in place to minimize the risks associated with operations, maintenance, and modification activities and the handling of materials and substances that could affect safety or the environment.

The Company has abided by the requirements of the regulation in section 6.1 of this program and assured the following:

- Sign all Customer Bridging Documents and Acknowledgements agreeing that policies and procedures between the Company and Customers are in line.
- Assure Customers that the Company has their own written safe work practices
- Document its agreement with Customers on appropriate safety and environmental policies and practices before beginning work at any GoM facilities.
- Document that Company employees are knowledgeable and experienced in the work practices necessary to perform their job in a safe and environmentally sound manner
- Assure that documentation of each employee's expertise to perform his/her job, and that copy of the Company's HSE Manual is available to all Customers at all times upon request

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## 7.0 Element 7: Training

The Training element establishes the need for training programs to ensure that work is performed safely and that employees are aware of environmental concerns. Training shall address operating procedures, safe work practices, and emergency response and control measures at a minimum. It should also include verification that the employees are trained to work in a safe and environmentally sound manner.

### 7.1 Applicable Regulations:

- 30 CFR 250.1915
- API RP75, Section 7

### 7.2 Specific Requirements:

The Company has a team of qualified instructors that will continue to provide the most up-to-date training required to work in the GoM. Our Corporate HSE department has identified all required training needed to work for any and all Customers; and has further developed The Company's Safety Craft Specific Training which enables Instructors the opportunity to assess employees' skill level by performing documented performance verifications. Upon completion of training, employees are fully aware of The Company's safe work practices and the Corporate HSE Manual. The Company's training program addresses the following:

7.2.1 Initial training for the basic well-being of personnel and protection of the environment, Customer required Safe Gulf, and Safety Craft Specific Training to ensure employees have the knowledge and skills to carry out their duties and responsibilities.

7.2.2 Periodic training (refresher) to maintain understanding of, and adherence to, the current operating procedures, using periodic drills to verify adequate retention of the required knowledge and skills.

7.2.3 All Company employees hired to work offshore shall go through the Company's Offshore Water Survival/HUET program which also incorporates the required API RP T-1 literature.

7.2.4 All Company employees working offshore will receive training on hydrogen sulfide due to unexpected exposure. This is part of the Company Core Curriculum.

## 8.0 Element 8: Assurance of Quality and Mechanical Integrity

The Assurance of Quality and Mechanical Integrity element establishes the procedures to ensure that the critical equipment is fit for service. Critical equipment includes, but is not limited to, any equipment that is used to prevent or mitigate the uncontrolled release of hydrocarbons, as well as any other substances that may pose environmental or safety risks.

### 8.1 Applicable Regulations:

- 30 CFR 250.1916
- API RP75, Section 8

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## 8.2 Specific Requirements:

Customers develop, and the Company must follow, written procedures that provide instructions to ensure the mechanical integrity and safe operation of equipment through inspections, testing, and quality assurance. The program must encompass all equipment and systems used to prevent or mitigate uncontrolled releases of hydrocarbons, toxic substances, or other materials that may cause environmental or safety consequences. These procedures must address the following:

8.2.1 The design, procurement, fabrication, installation, calibration and maintenance of equipment and systems in accordance with service requirements, manufacturer's design and material specifications, manufacturer's recommendations, and industry standards.

8.2.2 The training of each employee involved in maintaining equipment and systems so that they can implement the mechanical integrity program.

8.2.3 The frequency of inspections and tests of equipment and systems:

- The frequency of inspections and tests must be in accordance with BSEE regulations and meet the manufacturer's recommendations. Inspections and tests can be performed more frequently if determined to be necessary by prior operating experience.

8.2.4 The documentation of each inspection and test that has been performed on equipment and systems. This documentation must:

- Identify the date of the inspection or test
- Include the name, position, and signature of the person who performed the inspection or test
- Identify the serial number or other identifier of the equipment on which the inspection or test was performed
- Include a description of the inspection or test performed
- The results of the specific inspection or test

8.2.5 How correction of deficiencies associated with equipment and systems that are outside the manufacturer's recommended limits are made. Such corrections must be made before further use of the equipment and system.

8.2.6 The installation of new equipment and construction systems. The procedures must address the application for which they will be used.

8.2.7 The modification of existing equipment and systems. The procedures must ensure that such modifications are limited to the application for which they will be used.

8.2.8 Verification that inspections and tests are being performed. The procedures must be appropriate to ensure that equipment and systems are installed consistent with design specifications and manufacturer's instructions.

8.2.9 Assurance that maintenance materials, spare parts, and equipment are suitable for the applications for which they will be used.

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## 9.0 Element 9: Pre-Startup Review (PSSR)

The Pre-Startup Review element establishes the safety and environmental criteria that should be reviewed during the commissioning process for new and significantly modified facilities.

### 9.1 Applicable Regulations:

- 30 CFR 250.1917
- API RP75, Section 9

### 9.2 Specific Requirements:

Company employees must follow requirements of the SEMS program which requires that commissioning processes for new and significantly modified facilities include a pre-startup safety and environmental review to confirm that the following criteria are met:

9.2.1 Construction and equipment are in accordance with applicable specifications.

9.2.2 Safety, environmental, operating, maintenance, and emergency procedures are current, in place and adequate.

9.2.3 Hazards Analysis recommendations have been considered and implemented (as appropriate).

9.2.4 Training of operating personnel has been completed.

9.2.5 Programs to address management of change and other elements of the SEMS program are in place.

9.2.6 Safe Work Practices are in place.

## 10.0 Element 10: Emergency Response and Control

The Emergency Response and Control element mandates that emergency response and control plans (i.e., emergency action plans) are in place for all facilities and ready for immediate implementation. It also requires that realistic drills be conducted and analyzed on a periodic basis to help improve facility readiness.

### 10.1 Applicable Regulations:

- 30 CFR 250.1918
- API RP75, Section 10

### 10.2 Specific Requirements:

The Company requires that emergency response and control plans are in place and ready for immediate implementation for our employees. These plans must be validated by drills carried out in accordance with a schedule defined by the training program. Due to Company employees occupying Customer locations, employees are required to become familiar with and utilize Customer Emergency Action Plans while on their property. The SEMS emergency response and control plans must include:

10.2.1 Emergency Action Plan that assigns authority and responsibility to the appropriate qualified person(s) at a facility for initiating effective emergency response and control reporting requirements, and complying with all applicable government regulations.

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10.2.2 Emergency Control Center(s) designated for each facility with access to:  
Emergency Action Plans

- Oil spill contingency plan
- Fire / Blowouts
- Collisions
- Man Overboard
- Other safety and environmental information

10.2.3 Training and Drills incorporating emergency response and evacuation procedures conducted periodically for all personnel (including contractor's personnel), as required by the SEMS training program. The drills must:

- Be based on realistic scenarios
- Conducted periodically
- Exercise elements contained in the facility or area emergency action plan
- Be analyzed and critiqued to identify and correct weaknesses

### **11.0 Element 11: Investigation of Incidents**

The Investigation of Incidents element establishes procedures to investigate incidents that have the potential for or have caused serious safety or environmental consequences. Such investigations are meant to help prevent similar incidents by determining the causal factors and recommending appropriate corrective actions.

#### **11.1 Applicable Regulations:**

- 30 CFR 250.1919
- API RP75, Section 11

#### **11.2 Specific Requirements:**

The Company has established procedures for the investigation of all incidents with serious safety or environmental consequences and require investigation of incidents that are determined by Customers or BSEE to have possessed the potential for serious safety or environmental consequences. Incident investigations must be initiated as promptly as possible, with due regard for the necessity of securing the incident scene and protecting people and the environment.

Incident investigations shall be conducted by personnel knowledgeable in the process involved, investigation techniques, and other specialties that are relevant or necessary. The Company has also established a corrective action program based on the findings of the investigation in order to analyze incidents for common root causes.

11.2.1 At a minimum, the investigation of an incident must address the following:

- Nature of the incident
- Factors (human or other) that contributed to the initiation of the incident and its escalation/control
- Recommended changes identified as a result of the investigation

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11.2.2 The corrective action program must do the following:

- Retain the findings of investigations for use in the next hazards analysis update or audit
- Determine and document the response to each finding to ensure that corrective actions are completed
- Implement a system whereby conclusions of investigations are distributed to similar facilities and appropriate personnel within their organization

## **12.0 Element 12: SEMS Audit Program**

The SEMS Audit element establishes the requirements for audits of the SEMS program, including the scope, the need for a written audit plan, the frequency, and the requirements of the audit report. The goal is ensure that the elements of the SEMS program are being effectively implemented and to improve safety and environmental performance.

### **12.1 Applicable Regulations:**

- 30 CFR 250.1920-1926
- API RP75, Section 12

### **12.2 Specific Requirements:**

The Company will audit their SEMS Program according to the requirements set forth by the Corporate HSE Management System which is reviewed annually to ensure that it continues to be suitable, adequate and affective. If Management identifies the need for changes, they will be made accordingly while taking into considerations of audit results, changing circumstances and improvement initiatives.

Management findings shall be documented and posted on the Company Hazard Tracker to follow-up until closed.

## **13.0 Element 13: Records and Documentation**

The Records and Documentation element establishes recordkeeping and records-retention requirements.

### **13.1 Applicable Regulations:**

- 30 CFR 250.1928 and 1929
- API RP75, Section 13

### **13.2 Specific Requirements:**

The Company will follow the below recordkeeping and documentation requirements (Note: all records must be made available to Customers and BSEE upon request):

13.2.1 The Company will keep all SEMS related documents in their electronic filing system where they are kept forever. Additionally, any hard copy records kept on the facility shall be kept up to date ensuring that changes to programs are reflected.

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13.2.2 The Company shall keep all records backed up and protected from loss; and in an orderly manner, readily identifiable, retrievable and legible, and include the date of all revisions. Examples of such records include:

- Information on applicable regulations
- Complaint records
- Training records
- Process information
- Product information
- Inspection, calibration and maintenance records
- Pertinent contractor and supplier information
- Incident reports
- Emergency preparedness and response information
- Significant environmental information

#### **14.0 Stop Work Authority**

The SEMS II Final Rule added new requirements providing several key ways for personnel to help ensure safe performance of offshore oil and gas activities. This included implementing a stop work authority that creates procedures and authorizes any and all offshore industry personnel who witness an imminent risk or dangerous activity to stop work. Our Company policy is already implemented and integrated into all that we do.

#### **14.1 Applicable Regulations:**

- 30 CFR 30 CFR 250.1930

#### **14.2 Specific Requirements:**

We have integrated Stop Work Authority (SWA) into all activities performed on our Client’s platforms facilities as per our Stop Work Policy. This policy includes but is not limited to imminent risks or dangers such as:

- Death or serious physical harm; or
- Significant environmental harm to:
  - Land;
  - Air; or
  - Mineral deposits, marine, coastal, or human environment.
- As stated above, our Stop Work Policy is inclusive of significant risks and dangers but also is inclusive of lesser yet important risks and dangers.

14.2.1 Our policy states “Once work has been stopped, it will not resume until the hazard, whether real or perceived, has been adequately mitigated.”

14.2.2 Stop Work Authority is an integral part of all orientations given to each person hiring on with our Company and will be reiterated at safety meetings and daily shift meetings. Employees sign an acknowledgement of understanding stating that they believe that they can stop work at any time for unsafe behaviors/conditions without fear of retaliation. In addition, we have watermarked our hard hats, JSEA documents and Employee ID cards with our logos showing Leadership support.

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14.2.3 All instances of SWA shall be documented in our online database SMP, for tracking and trending.

### **15.0 Ultimate Work Authority**

This procedure will apply to all FM O&G OCS platforms as per the requirement of.

#### **15.1 Applicable Regulations:**

- 30 CFR 250.1931

#### **15.2 Specific Requirements:**

Our Company understands that Ultimate Work Authority (UWA) lies in the hands of our Clients and have acknowledge that they must integrate this process into all activities performed on their platforms. This policy states that local managers and line supervisors are responsible and accountable for providing and maintaining a healthy, safe working environment for employees and contractors while preventing environmental exposures resulting from the Company's activities in their respective areas of responsibility. These managers and supervisors are, therefore, the UWA on their respective facilities. They are also the UWA of any and all additional facilities or vessels that may be attached and working together or in close proximity to one another to perform an OCS operation.

15.2.1 We understand that the Person-in-Charge may be designated with UWA responsibility. The Person-in-Charge will change regularly and therefore will be clearly identified on a posted board located in the platform Control Room (Emergency Control Center) and on the platform Person-on-Board (POB) list. All potential Persons-in-Charge will sign on the platform station bill.

15.2.2 The UWA will be clearly identified on the station bill. The UWA is authorized to pursue the most effective action necessary in that individual's judgment for mitigating and abating the conditions or practices causing the emergency.

### **16.0 Employee Participation Plan (EPP)**

This procedure will apply to all FM O&G OCS platforms as per the requirement of

#### **16.1 Applicable Regulations:**

- 30 CFR 250.1932

#### **16.2 Specific Requirements:**

Compliance with this requirement is achieved through the implementation of Culture of Care program and Hotline, which establishes, among other things, a plan of action for involvement of employees in all company EH&S activities. Our Culture of Care team meets once every quarter and has bi-weekly conference calls communicating important Company information. Our Hotline also allows for anonymous reporting of unsafe working conditions if warranted.

16.2.1 In addition to the activities in the above procedure, employees participate in hazard reviews, operating procedures reviews, HSE audits, inspections, incident investigations, and routine JSEA development.

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## 17.0 Reporting Unsafe Working Conditions

### 17.1 Applicable Regulations:

- 30 CFR 250.1933

### 17.2 Specific Requirements:

Every Company employee is trained and acknowledges at hire, that they should report all unsafe working conditions immediately to their supervisors. Furthermore, we have established two forms of anonymous reporting methods for employees to report unsafe conditions. In 2012, our Hotline was established which gave all employees a single phone number to call should they need to discuss matters of HSE, or report incidents. A selection prompt upon connection gives them the opportunity to anonymously leave messages of concern. Another method has been introduced on our website to provide another means of reporting anonymously which is our “Report It” feature. All employees are made aware of this through several platforms of information sharing. Additionally, employees are encouraged and trained to mitigate unsafe working conditions before starting the job, however, unsafe conditions which are not able to be immediately removed from the jobsite should be reported to the Personnel in Charge (PIC), Company site supervisor and the Corporate HSE Department. If any unsafe condition results in the use of SWA, the UWA should be notified immediately.