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Subpart A – Purpose & Scope

This Health, Safety, and Environmental Management System (HSEMS) describes **Berry Bros. General Contractors, Inc.** management approach to key business processes involving Health, Safety & Environmental practices. This document (HSEMS-01) identifies the basic requirements for managing risks in terms of what to do rather than detailed specifications of how to do. This document aligns the health, safety and environmental policies and procedures (how to do) Safe Work Practices (SWP), Standard Operating Procedures (SOP), and Human Resource Policies (HRP) by reference herein (See Appendix VI). HSEMS-01 must be utilized in conjunction with the referenced policy and procedures contained in the company HSE Policy and Procedure Manual, HSE Employee Handbook, Standard Operating Procedures, and BBGCI's Human Resource Employee Handbook.

The primary purpose of this management system is to provide an organized approach to reduce the risks of occupational health, safety, and environmental incidents that may cause injuries, illnesses, fatalities, and environmental harm. The management system aligns with the corporate vision, mission,

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policy, and applies to all activities, products, and services provided by **Berry Bros. General Contractors, Inc.**

Subpart B – Responsibilities

Joe'al Berry, President **Berry Bros. General Contractors, Inc.**, is accountable for communication of this policy and for compliance with its undertakings. HSE Risk Management Coordinator, will ensure the effective implementation, management and monitoring of this HSE Management System and its subsequent outcomes.

While management carries these accountabilities and responsibilities; if they are to be fully effective, responsibility and accountability for health, safety, and environment must be owned by all employees and contractors of **Berry Bros. General Contractors, Inc.** This will be demonstrated by everyone showing awareness, understanding, and compliance with regulatory and company HSE standards and requirements.

Specific HSE responsibilities for positions within the company are listed in Appendix I to this policy.


Subpart C – Management Policy Statement

HSE Mission Statement

The safety and well-being of our employees, sub-contractors, and stakeholders is our most important pursuit. Through demonstrated leadership and management commitment we will establish a systems approach and continuous improvement. We will strive to do no harm to people, property, or the environment.

HSE Guiding Principles

1. We will meet or exceed all applicable environmental, health, and safety rules, laws and regulations with a mindset of hazard elimination.
2. We believe that our work is never so urgent or important that we cannot take the time to do it safely and in an environmentally responsible manner.
3. We believe that all employees shall be instilled with Stop Work Authority and are expected to use it when warranted. We believe that stopping a job for the right reasons is more than a right, it's an obligation. We further believe that production in the absence of safety should never be valued or rewarded.

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4. We will report **ALL** incidents, near misses, and spills, so that investigations can be conducted and corrective actions taken. The sharing of information and lessons learned is a key fundamental.
5. We will strive to continually improve the health, safety and environmental performance through the involvement of all employees and partnerships with the client community towards Incident Free Operations.
6. Consideration of the long-term improvement in employee health and fitness.
7. Use environmentally sound practices and other protections for the environment.
8. Abide by our 11 Life Saving Tenets and Building Blocks for Safety as outlined in Appendix II.

We believe that all employees shall be empowered through training, mentoring, and awareness to act on their own to make a difference, and that safety is not purely the job of the safety department, but is a shared responsibility throughout the organization. The active involvement by all employees is key and each will likewise be held accountable for their HSE performance.


Joe 'al Berry

Joe'al Berry President

This Management Policy Statement is communicated to all persons working for or on behalf of **Berry Bros. General Contractors, Inc.** through the following means:

- Field Safety Meetings,
- Safety Committee Meetings,
- Periodic e-mail correspondence,
- New Hire Orientations,
- HSE Employee handbook,
- Posted throughout the workplace, and
- SafeWork Suite home page message board.

Refer to SWP- 079 HSE Communication Policy for more information.

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Subpart D – Planning

1. Planning for Hazard Identification, Risk Assessment and Risk Control

Berry Bros. General Contractors, Inc. has established, implemented, and maintains the HSE Planning procedure: The procedure is designed to:

- a. To identify job and area hazards,
- b. To determine the risks associated with those hazards, and
- c. To identify appropriate operational controls to eliminate, lower and/or maintain risks at an acceptable level to prevent harm to company employees.

The company utilizes SafeWork Suite Software that includes six hazard identification tools (Behavior Based Safety Solutions, Hazard Hunter, Inspection Reporter, Stop Work Authority and JSEA) for hazard identification and control verification. These tools are routinely used in the operations to record hazard identification activities which are integrated into a single Corrective Action Tracker (CAT) software system. The CAT software provides a systematic tracking feature to manage operational control efforts to eliminate, lower, and or maintain risks. The SafeWork Suite software is deployed in the cloud and provides real-time dash boarding capability to identify trends and analytical data mining capabilities.


Berry Bros. General Contractors, Inc. will ensure that its hazards and associated risks are taken into account in establishing, implementing and maintaining its health, safety and environmental management system and associated objectives.

Refer to SafeWork Practices SWP-008, SWP-045 and SWP-073 for Behavior Based Safety, JSEA and SWA Programs.

2. Legal and Other Requirements

The applicable legal requirements and other requirements to which the organization subscribes are taken into account in establishing, implementing and maintaining its health, safety and environmental management system. **Berry Bros. General Contractors, Inc.** has established the following procedures to identify and maintain all relevant health, safety and environmental regulatory requirements that pertain to its activities.

- a) Membership in DISA, IS Network, NCMS, PICS, PEC Premier, and Team Alert provides access to a comprehensive safety questionnaire that is reviewed and updated on a quarterly basis by

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company HSE staff. The aforementioned databases are maintained by our professional HSE staff and provided the legal and client specific requirements. In addition, each HSE SafeWork Practice, Policy and Procedure undergoes a Management Review process. Our safety committee will review a pre-determined number of policies each month. Every policy is reviewed at least once every four years.

- b) Once a quarter the HSE staff updates the databases and upon notification of a new legal requirement, the relevance and impact on this safety management system and policy and procedures is considered in the monthly safety committee process.
- c) The company has access to current US regulatory requirements through the Government Printing Office online portal found at www.ecfr.gov. Any changes to the regulations that may become a final rule within the Administrative Procedures Act and Federal Register System are posted within 48 hours to online web source.
- d) The company also maintains awareness of changes to legal requirements subscriptions to monthly journals such as *Professional Safety*, *Safety+Health* and memberships with the American Society of Safety Engineers and National Safety Council. In addition, the company has retained outside HSE consultation services and maintains active dialog with client safety representatives.

3. Internal Bridging Document for Specific Company Requirements


Specific legal requirements based on the operational segment of the company are identified through an internal bridging document. Specific policies and procedures which may apply to a particular segment of the company (i.e. Marine operations) are identified. Each operational segment follows applicable and specified legal requirements and company requirements based on geographical locations and operations within the company. The bridging system is designed to ensure operational compliance within diverse company operations.

In the event of any legal changes that may impact this management system and pertinent safety, health and environmental policies and procedures; the safety committee will assess the impact and communicate changes throughout the affected management structure.

Refer to Appendix III for the current internal HSE policy and procedure divisional bridging system.

4. Goals and Management Program(s)

Berry Bros. General Contractors, Inc. will establish health, safety, and environmental HSE improvement goals as part of its management review process. New goals will be established each year in the management review held just prior to the initiation of the strategic planning process to allow for incorporation into the strategic plan and to ensure adequate financing of the projects. New goals are

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typically proposed by supervisors or by process owners based on an assessment of health, safety and environmental management system performance and changing circumstances.

The Safety Committee will establish the annual goals and take into account the legal and client requirements to which the company subscribes, and its risk based workplace hazards. The company will also consider its technological options, its financial, operational and business requirements, and the views of interested parties. Based on annual goals the Health, Safety & Environmental initiatives are established to reach stated goals.

These goals are measurable, where practicable, and consistent with the health, safety and environmental policy, including the commitments to compliance with applicable legal requirements, hazard elimination and to continual improvement. Monthly safety committee meetings will review progress towards stated goals.

Refer to Appendix IV– Annual HSE Improvement Goals for the current year.


Subpart E – Structure and Responsibility

Management ensures the availability of resources essential to establish, implement, maintain and improve the health, safety and environmental management system. Resources include human resources and specialized skills, organizational infrastructure, technology and financial resources.

Roles, responsibilities and authorities will be defined, documented and communicated in order to facilitate effective health and safety management. Roles, responsibilities and authorities may be documented in job descriptions (major duties), competency matrices (job specific responsibilities) and within local procedures and instructions (task and functional responsibilities).

Berry Bros. General Contractors, Inc. top management has appointed the HSE/Risk Management Coordinator to manage implementation of the HSEMS. The HSE/Risk Management Coordinator has the responsibilities and authority for:

- a. Ensuring that a health, safety & environmental management system is established, implemented and maintained in accordance with the requirements of this policy, and
- b. Reporting to top management on the performance of the health and safety management system for review, including annual goals and recommendations for improvement.

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All **Berry Bros. General Contractors, Inc.** employees have the responsibility to ensure their own safety as well as that of their fellow workers by adhering to the established Safe Work Practices (SWP), Standard Operating Procedures (SOP), and the Human Resource Policies and Procedures (HRPP) associated with the health, safety and environmental management system.

Active employee involvement and participating in the Risk based identification of workplace hazards and corrective action recommendations will be tracked by the SafeWork Suite software and performance monitored during monthly safety committee meetings. The software will provide a risk meter for employees to assess the perceived risk level of the hazard. Employees are trained to stop the job when perceived risk levels are “High – Extreme”.

Refer to Risk Matrix below:

Likelihood

| | | Likelihood | | | | |
|-------------|---|--|----------|----------|---------|----------------|
| | | Rare | Unlikely | Possible | Likely | Almost Certain |
| Consequence | Severe Eg. Extensive injury/permanently maim or death | MEDIUM | MEDIUM | HIGH | Extreme | Extreme |
| | Major Eg. Long term injury or illness | MEDIUM | MEDIUM | MEDIUM | HIGH | Extreme |
| | Medium Eg. Medical attention required with time off work (Lost Time Injury) | LOW | LOW | MEDIUM | MEDIUM | HIGH |
| | Minor Eg. First aid required/hazard or near miss reported with follow up action | LOW | LOW | LOW | MEDIUM | MEDIUM |
| | Insignificant Eg. No injury or hazard or near miss requiring follow up | Insignificant events not requiring follow up are not considered relevant within the context of a health and safety risk assessment framework: any health and safety risk is considered to have some significance | | | | |

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Subpart F – Training, Awareness and Job Competency

Berry Bros. General Contractors, Inc. shall ensure that all employees and any other person performing tasks for it or on its behalf are competent on the basis of appropriate education, training, or experience to safely perform the tasks assigned to them, and shall retain associated records.

The Competency Program as defined in SWP – 044 provides details of the company procedure for ensuring employee and subcontractor competencies.

Berry Bros. General Contractors, Inc. will identify competencies and training needs associated with their operations, including those relating to health, safety and environmental. These competencies shall be identified on the company Training Matrix. The competencies that affect all employees will be identified by the safety committee and will also be listed on the Training Matrices. Supervisors shall provide for the necessary training or take other action to meet these needs, as identified in the Training Matrix.


Refer to Subpart E

Berry Bros. General Contractors, Inc. has established, implemented and maintains a process to make employees and other persons working for it or on its behalf aware of:

- a. The importance of conformity with the health, safety & environmental policy and procedures and with the requirements of the HSE management system,
- b. The hazards and potential risks associated with their work, and the health, safety, and environmental benefits of improved personal performance,
- c. Their roles and responsibilities in achieving conformity with the requirements of the HSE management system, and
- d. The potential consequences of departure from specified procedures as outlined in the company Disciplinary Action program – SWP-018.

For **Berry Bros. General Contractors, Inc.** employees and for temporary workers, this is accomplished during orientation training, through the use of Health and Safety Message board posted on the home page of SafeWork Suite, company bulletin boards in the workplace, and during weekly safety meetings. For subcontractors, if any; a Health and Safety Briefing will be used to both communicate the importance of conformity with health and safety policies and procedures and to identify the health, safety and environmental hazards and controls associated with contractor work.

Additional Contractor / Subcontractor Safety Management practices are outlined in SWP- 016.

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Refer to SWP – 018 for company Disciplinary action program.

Subpart G – Consultation and Communication

With regard to its health, safety, and environmental management system, **Berry Bros. General Contractors, Inc.** has established, implemented and maintains a process for:

- a. Internal communication between the various levels and functions of the organization. **Berry Bros. General Contractors, Inc.** has established a message board feature within the SafeWork Suite software for communication of important information relative to health, safety and environmental performance. Employees have access to the Corrective Acton (CA) Software to open CA's for any hazards identified, ideas and/or concerns from employees. CA's are reviewed and tracked within the Corrective Action Tracker software.
- b. Receiving, documenting, and responding to relevant communication from external interested parties is managed by the HSE/Risk Management Coordinator. All outside inquiries relating to information about **Berry Bros. General Contractors, Inc.** health, safety & environmental management system are routed to the HSE/Risk Management Coordinator who maintains a record that captures the information from the inquiry and assigns the appropriate **Berry Bros. General Contractors, Inc.** employee to respond. The HSE/Risk Management Coordinator also follows up to ensure a response was provided to the requestor. All outside inquiries are communicated by the HSE/Risk Management Coordinator during monthly safety committee meetings.
- c. **Berry Bros. General Contractors, Inc.** will maintain consultation and involvement of the workforce in the identification of hazards, risks and operational controls (including procedures and policies) to minimize these risks. The company has a robust safety tracking system available within the software application SafeWork Suite. Advanced metrics and reporting capabilities enable the HSE team to effectively manage the hazard identification activities conducted by area lead supervisors and employees.

The HSE/Risk Management Coordinator is responsible for analyzing all internal and external communications for the past year as part of his/her preparation for the end of year management review. This information will be used to summarize the feedback from interested parties during the setting of health and safety annual goal.

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Subpart H – Documentation

The health, safety, and environmental management system documentation includes:

- a. The health and safety policy and objectives,
- b. This HSE Policy & Procedure Manual which includes a description of the scope of the health and safety management system, a description of the main elements of the health and safety management system and reference to related documents,
- c. Procedures and records required by this policy, including JSEA's, and
- d. Procedures, instructions, guidelines and records, determined by **Berry Bros. General Contractors, Inc.** to be necessary to ensure the safe planning, operation and control of processes and operations. The core HSEMS procedures are called out in this policy.


Refer to subpart N for additional recordkeeping guidelines applicable to HSEMS. Records and record management

Subpart I – Document and Data Control

The documents required by this management system will be controlled based on the specification below. Records are a special type of document and shall be controlled in accordance with the requirements given in Subpart I and Subpart N of this policy.

The Document and Record Control Procedure provides instructions to:

- a. Approve documents for adequacy prior to issue,
- b. Review and update as necessary and re-approve documents,
- c. Ensure that changes and the current revision status of documents are identified,
- d. Ensure that relevant versions of applicable documents are available at points of use,
- e. Ensure that documents remain legible and readily identifiable,
- f. Ensure that documents of external origin determined by the organization to be necessary for the safe planning and control of **Berry Bros. General Contractors, Inc.** operations are identified and their distribution controlled, and
- g. Prevent the unintended use of obsolete documents and to apply suitable identification to them if they are retained for any purpose.

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Subpart J – Operational Control

Berry Bros. General Contractors, Inc. through the efforts of the lead supervisors, safety consultant and management will follow the Health, Safety & Environmental Planning procedure outlined in Subpart D of this policy to identify and develop plans for those operations that are associated with **Berry Bros. General Contractors, Inc.** identified hazards and risks consistent with its health and safety policy and objectives. This process will ensure that these activities are carried out under specified conditions, by:


- a. Establishing, implementing and maintaining documented procedures to control situations where their absence could lead to deviation from the health, safety & environmental policy and objectives, including the identification and execution of necessary preventive maintenance and the development of JESAs.
- b. Stipulating any necessary operating criteria in these procedures.
- c. Establishing, implementing and maintaining procedures related to the identified hazards and risks associated with goods and services used by the organization and communicating applicable procedures and requirements to suppliers, including contractors if any. Suppliers are required to provide appropriate health, safety, and environmental information about their products (i.e. SDS sheets) as part of the order. These are maintained in SDS binders available to all employees on jobsite locations. Significant hazards and risks associated with new materials are reviewed by the safety consultant and management for appropriate operational controls.

Subcontractors if any that are involved in work that involves significant risk are requested to describe their work, potential hazards and controls in a Health, Safety, and Environmental briefing. Only properly trained, certified and/or licensed subcontractors are used to perform work that presents significant workplace risk. **Berry Bros. General Contractors, Inc.** HSE policy and appropriate requirements will be communicated to subcontractors prior to the start of any work. Specific instructions for the communication with suppliers and contractors will be provided in the Health and Safety Briefing.

- d. Reviewing and appropriately controlling any hazards associated with new or modified facilities, equipment or processes. This is accomplished using **Berry Bros. General Contractors, Inc.** or host client Management of Change process.

Subpart K – Emergency Preparedness and Response

Berry Bros. General Contractors, Inc. has established, implemented and maintains emergency plans and procedures to identify potential emergency situations and potential accidents and how **Berry Bros. General Contractors, Inc.** will respond to them. These plans and procedures include:


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- Emergency and Evacuation Plan
- Spill Prevention, Countermeasure and Control Plan (SPCC)
- First Aid Plan
- Host Facility Emergency Action Plans

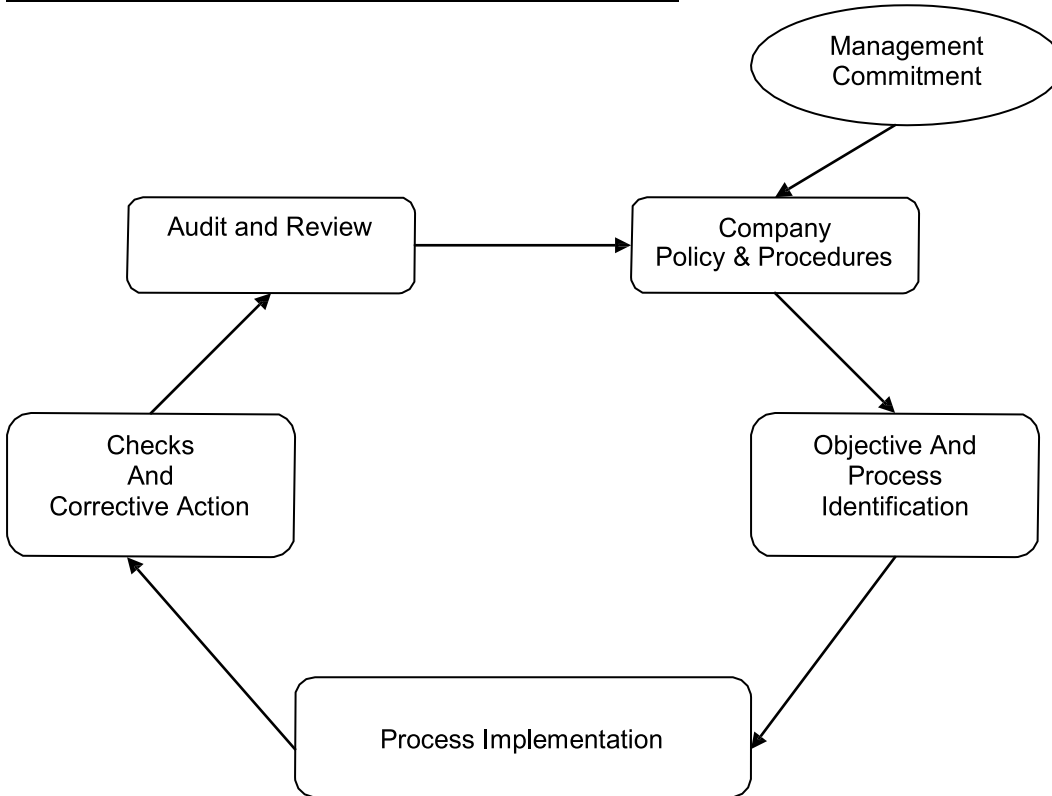
These plans provide details on how **Berry Bros. General Contractors, Inc.** responds to actual emergency situations and accidents and prevents their occurrence. These plans are periodically reviewed and, where necessary, revised including after the occurrence of accidents or emergency situations. At a minimum, annual desktop drills will be conducted to periodically test these procedures. In addition; BBGCI will participate in all host client drills when required or asked to participate.

A formal incident critique will be held within 24 hours of each actual incident or emergency in order to fully investigate and document the occurrence. **Berry Bros. General Contractors, Inc.** will respond and take the necessary corrective action(s) to prevent recurrence.

The safety consultant and management shall participate in the critique. All such critiques will be documented, including actions taken to prevent recurrence, and any necessary post-incident notifications or reports made to local, state or government agencies in accordance with regulatory requirements.


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Subpart L – Checking and Corrective Action



Berry Bros. General Contractors, Inc. will establish, implement and maintain processes to monitor and measure, on a regular basis, the key characteristics of its operations that present workplace & environmental hazards and risk to personnel or property. Operational metrics, both quantitative and qualitative, will be determined and recorded. Data and information needed to monitor performance, applicable operational controls and conformity with the organization’s health and achievement of health, safety and environmental goals is collected and reported. Data and information includes both proactive and reactive measures of performance. Relevant information is communicated via software dashboard metrics, emails, weekly safety meetings, monthly safety committee meetings and posting on the message boards or SafeWork Suite.

Berry Bros. General Contractors, Inc. will ensure that all health, safety and environmental monitoring and measurement devices, including sensors used in operational controls, are calibrated or verified as required and associated records maintained. All health, safety environmental monitoring and measurement devices requiring calibration will be maintained in accordance with the manufacturer’s recommendations and requirements. **Refer to SOP – 4 Air / Gas Contaminants.**

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Consistent with its commitment to regulatory compliance, **Berry Bros. General Contractors, Inc.**, has established, implemented and maintained a process for periodically evaluating compliance with applicable legal requirements. **Berry Bros. General Contractors, Inc.** uses health and safety specialists to perform annual assessments of **Berry Bros. General Contractors, Inc.** compliance to regulatory requirements. Records of the results of these periodic reviews are maintained and are reviewed with the **Berry Bros. General Contractors, Inc.** management. Any deficiencies noted during the review will establish appropriate actions to correct any shortcomings.

Subpart M – Accidents, Incidents, Nonconformance’s and Correct Actions


Berry Bros. General Contractors, Inc. has established and implemented procedures for dealing with actual and potential nonconformities and for taking corrective actions. **These procedures are contained in the Incident Reporting and Investigation Policy SWP - 002 and SWP - 003.** The procedure defines requirements for:

- a. Identifying and correcting nonconformities and taking actions to mitigate their health, safety, and environmental consequences.
- b. Investigating nonconformities, determining their causes and taking action in order to avoid their recurrence.
- c. Evaluating the need for action to prevent nonconformities and implementing appropriate actions designed to avoid their occurrence/re-occurrence.
- d. Recording the results of corrective actions using SafeWork Suite CA Tracker software, and
- e. Reviewing the effectiveness of actions taken.

Actions taken shall be appropriate to the magnitude of the problems and the health, safety, and environmental risk encountered. The HSE/Risk Management Coordinator will ensure that any necessary changes are made to health, safety & environmental management system documentation.

Subpart N – Records and Records Management

Berry Bros. General Contractors, Inc. has established, implemented and maintains a Document and Record Control procedure to ensure that all records required by law or necessary to demonstrate conformity to the requirements of its health, safety & environmental management system are retained. This procedure provides for the identification, storage, protection, retrieval, retention and disposal of records. Records shall be and remain legible, identifiable and traceable.

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| Safety and Environmental Information | Minimum 2 years |
| JSEA's | Minimum 2 Years |
| Management of Change | Minimum 2 years |
| Weekly Safety Meeting Records | Minimum 2 years |
| Permit To Work | Minimum 2 years |
| Calibration Documents | Minimum 2 years |
| Operating Procedures | Permanent |
| Safe Work Practices | Permanent |
| Training | Minimum 5 years |
| Weekly Safety Meeting Reports | Minimum 5 years |
| Incident Investigation Reports | Minimum 5 years |
| Injury / Illness Log | Minimum 5 years |
| Audit Reports | Minimum 6 years |
| Medical Records | 30 years plus duration of employment |

Subpart O – Audit

Berry Bros. General Contractors, Inc. will establish, implement and maintain an Internal Audit procedure to ensure that internal audits of the health and safety management system are conducted at planned intervals to:


- a. Determine whether the health, safety & environmental management system:
 - 1. Conforms to planned arrangements for HSE management including the requirements of this management system policy,
 - 2. Has been properly implemented and is maintained, and
 - 3. Is effective.
- b. Provide information on the results of audits to management.

Subpart P – HSEMS Management Review

Top management shall review the HSEMS at a minimum, annually to ensure its continuing suitability, adequacy and effectiveness. Reviews shall include assessing opportunities for improvement and the need for changes to the HSE management system, including the HSE policy and goals. Records of the management reviews shall be retained.

Input to management review includes:


- a. Results of internal audits and evaluations of compliance with legal requirements and with other requirements to which the organization subscribes.

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- b. Communication(s) from external interested parties, including regulatory agencies.
- c. The HSE performance of the organization.
- d. The extent to which goals have been met.
- e. Status of corrective and preventive actions.
- f. Follow-up actions from previous management reviews.
- g. Changing circumstances, including developments in legal and other requirements related to its HSEMS, and
- h. Recommendations for improvement.
- i. Management review of policy and procedures

The outputs from management reviews shall include any decisions and actions related to possible changes to health and safety policy, goals and other elements of the HSE management system, consistent with the commitment to continual improvement. Records of the management review shall be retained by the HSE/Risk Management Coordinator.

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| All | July 24, 2013 | Original Issue |
| All | October 21, 2015 | Revised and Edited |
| All | December 1, 2015 | Approved |
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Appendix I – Defined Roles and Responsibilities

Each organization’s top management defines roles, assign responsibilities, establish accountability, and delegate’s authority to implement an effective HSE management system. For the system to work effectively, each person within the organization needs to understand his/her roles and responsibilities.

President, Chief Executive Officer, Owner


1. Issues the organization’s HSE policy and sets the example for HSE culture.
2. Assume overall responsibility for the implementation of the **Berry Bros. General Contractors, Inc.’** HSE Management System at all facilities under the organization’s control.
3. Assess information provided during a management review and direct actions to continually improve the HSEMS and reduce risk in the workplace.

Executive Officers, Vice Presidents, and other Senior Leadership

1. Provide visible guidance and operational leadership for implementing the culture and HSEMS consistently with the organization’s policy in all facilities and operations.
2. Assess information provided during a management review, and direct actions to continually improve the HSEMS and reduce risk in the workplace.

Directors, Managers, Superintendents

1. Communicate and implement the organization’s HSEMS and its requirements to employees, visitors, and contractors.
2. Direct individuals under their supervision, including but not limited to supervisors, regular and temporary employees, contractors, and other affected personnel to obtain any required HSEMS -related training.
3. Develop a process to maintain incident/illness prevention and health and safety programs.
4. Develop a process to perform risk assessments.
5. Determine that HSEMS objectives and needs for units/departments are met.
6. Incorporate HSEMS requirements and responsibilities into each appropriate job description, and ensure that system requirements and expectations are communicated to each employee.
7. (Engineering) Assess the health and safety impact of new processes and equipment, and incorporate appropriate controls.
8. (Procurement/Contractor) Include HSE performance when evaluating and selecting suppliers and contractors.

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9. Maintain and improve programs for occupational health, hazardous materials management, radiation safety, general safety, incident/fire prevention, and biological safety.
10. Conduct periodic health and safety audits (hazards, risks, and management systems) of work areas and/or facilities.
11. Maintain and improve emergency action and disaster preparedness plans that provide clear roles and responsibilities for all personnel, in order to ensure familiarity and coordination between facility personnel and emergency responders.

Supervisors, Foremen, Leadermen

1. Implement the HSE Management System and all other organizational safety practices and programs under their supervision or control.
2. Require all staff members under your direction to successfully complete required safety and HSEMS training.
3. Collect, recommend, and implement HSE improvements.
4. Collect appropriate data per the HSEMS.
5. Ensure that there is a process in place to maintain workplaces and equipment under their direction that are safe, well kept, and in compliance with the SafeWork Practices and Standard Operating Procedures.
6. Ensure that procedures are developed for the safe use of hazardous chemicals, physical, radiological, and biological substances.
7. Conduct or arrange for risk assessments.
8. Conduct incident investigations.
9. Meet all health and safety needs for units/departments (e.g., engineering controls, training, personal protective equipment, and corrective measures including non-compliance items identified in health and safety audits).


Employees (Laborers, Operators, Welders, etc.)

1. Comply with the organization's HSE Policy and all other health and safety practices, programs, and procedures.
2. Successfully complete required health and safety training.
3. Participate in the HSEMS by reporting incidents or near misses, attending health and safety meetings, reporting problems and recommending improvements, and other related activities.
4. Inform a supervisor or instructor of any safety hazards or system deficiencies in the workplace.

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Health, Safety and Environmental Department

1. Plans and implements safety policies and procedures in compliance with local, state, and federal occupational Safety and Health Administration (OSHA), Bureau of Ocean Energy Management Regulation and Enforcement (BOEMRE), Department of Transportation (DOT), U.S Coast Guard (USCG), and other applicable rules and regulations.
2. Plans and implements programs to train managers, supervisors, and employees in work site safety practices.
3. Inspects organization facilities to detect existing or potential accident and health hazards, determines corrective or preventative measures where indicated, and follows-up to ensure measures have been implemented.
4. Leads the investigation of accidents and injuries and cooperates in the preparation of material and evidence for organization use in hearings, lawsuits, and insurance investigations.
5. Complies and submits accident reports required by regulatory agencies and clients.
6. Oversees the administration of workers' compensation program, including working with the insurance carrier to reduce employee lost time.
7. Represents the organization in community or industry safety groups and programs.
8. Maintains safety files and records.
9. Provides technical support to field and staff employees; including visitations, audits, presentations and safety meetings at various employee and customer locations (including employee departure sites and customer's office).
10. Assure adherence to all regulatory laws and customer-driven requirements, rules, policies and procedures during all phases of Health, Safety, and Environmental activities.
11. Promotes a safe workplace for all employees; rectifies any deficiencies that may threaten or cause harm to people, property, or to the environment.
12. Responds to any work-related incident during work hours and emergencies after work hours (24-hour emergency call).
13. Manages regulatory and internal documentation; disseminates applicable information to respective organizations, departments and customers at fixed intervals or by request.
14. Maintains communication with injured employees; manages employee Return-to-Duty and light-Duty processes.
15. Assesses and maintains employee training records according to regulatory, customer and internal requirements; Coordinates scheduling for initial and refresher training events.
16. Conducts orientations and trains new applicants according to regulatory, customer, and internal requirements.
17. Ensures that all employees participate in the company Random Drug Program and adheres to all regulatory and customer requirements.
18. Monitors usage and runs statistical reports from the SafeWork Suite and reports to the Safety Committee and Management for use in the annual goals and improvement plan of the HSEMS.

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Appendix II – BBGCI TENETS of SAFETY

| | BBGCI's 11 LIFESAVING TENETS |
|---|--|
|  | <p>Verify isolation / depressurization before work begins.</p> |
|  | <p>Monitor the work area (gas tests) when required.</p> |
|  | <p>Wear your seat belt, obey posted speed limits, and no cell phone use while driving.</p> |
|  | <p>Never override or disable safety critical equipment without prior written approval.</p> |
|  | <p>Smoke in designated areas only.</p> |



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No alcohol or drugs while working or driving.



Wear the proper PPE for the job task at hand. (Hard hat, gloves, eye protection, FRC's, Steel toe, fall protection, hearing and respiratory).



Use tag lines and do not walk under suspended loads.




Always follow safe work practices and procedures.



Obtain authorization before entering a confined space.



Complete a JSEA before each job and each new job task.

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BBGCI's BUILDING BLOCKS TO SAFETY


BBGCI is committed to causing ZERO HARM to people assets, and the environmental and promoting a culture for sustainable leadership of effective and enhanced occupational health, safety and environmental practices.

BBGCI will strive to:

Comply with LAWS, STANDARDS, and PROCEDURES set forth by the Federal Government, the State, Clients, and the Company.

**Intervene in any unsafe or non-compliant situations.
(STOP WORK AUTHORITY)**

Respect our neighbors, clients, and the environment.

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APPENDIX III - HSE Policy Divisional Bridging System

| Policies | Marine Division (Dry Dock, Dock Services) | HVAC | FAB Shop | Electrical/I &E | Production/Mechanical /Civil |
|---|--|------|----------|-----------------|------------------------------|
| Access to Employee Exposure & Medical Records P&P | X | X | X | X | X |
| Accident Investigation P&P | X | X | X | X | X |
| Accident Reporting P&P | X | X | X | X | X |
| Air / Gas Contaminants | X | X | X | | X |
| Asbestos Safety P&P | X | X | | X | X |
| Assured Grounding P&P | X | X | X | X | X |
| Accident Prevention Sign, Tags and Barricades | X | | X | X | X |
| Behavior Based Safety P&P | X | X | X | X | X |
| Benzene P&P | X | | | X | X |
| Bloodborne Pathogen P&P | X | X | X | X | X |
| Cadmium P&P | X | | X | | X |
| Compressed Gas Cylinder P&P | X | X | X | X | X |
| Concrete & Wood Work Safety | X | | | | X |
| Confined / Inert Space Program | X | X | | | X |
| Construction Cranes | X | | X | X | X |
| Contractor / Sub-Contractor P&P | X | X | | X | X |
| Crane and Hoist Operations P&P | X | | X | X | X |
| Disciplinary P&P | X | X | X | X | X |
| Drug & Alcohol P&P | X | X | X | X | X |
| Electrical Safety P&P | X | X | X | X | X |
| Emergency Response P&P | X | X | X | X | X |
| Environmental Management P&P | X | X | X | X | X |
| Ergonomics P&P | X | X | X | X | X |
| Excavation and Trenching P&P | X | | | X | X |
| Fall Protection / Fall Arrest & Inspection P&P | X | X | | X | X |
| Fire Safety & Prevention P&P | X | X | X | X | X |
| Fit for Duty / Fatigue Management P&P | X | X | X | X | X |
| Flammable and Combustible Liquids | X | X | X | X | X |
| Forklift/ Powered Industrial Truck / Aerial Lifts P&P | X | | X | X | X |



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|--|---|---|---|---|---|
| General Safety Rules P&P | X | X | X | X | X |
| Hand and Portable Power Tool P&P | X | X | X | X | X |
| Harassment and Work Place Violence P&P | X | X | X | X | X |
| Hazard Communication P&P | X | X | X | X | X |
| Hazardous Waste Management System | X | X | | | X |
| Hazardous Waste Operation – Emergency Response | X | X | | | X |
| Hearing Conservation P&P | X | X | X | X | X |
| Heat Stress Program | X | | X | X | X |
| Hexavalent Chromium P&P | X | | X | X | X |
| Hot Bolting P&P | X | | | | X |
| Hot Work / Welding P&P | X | X | X | X | X |
| Housekeeping P&P | X | X | X | X | X |
| Hydro-Blasting Program | X | | | X | X |
| Hydrogen Sulfide P&P | X | | | X | X |
| Job Competency | X | X | X | X | X |
| Job Safety Environmental Analysis P&P | X | X | X | X | X |
| Journey Management P&P | X | X | X | X | X |
| Lead Safety Program P&P | X | X | X | X | |
| Lockout / Tagout Program (LOTO) P&P | X | X | X | X | X |
| Machine Guarding P&P | X | X | X | X | X |
| Management of Change P&P | X | X | X | X | X |
| Manual Lifting P&P | X | X | X | X | X |
| Marine Transportation P&P | X | | | | |
| Medical and First Aid P&P | X | X | X | X | X |
| N.O.R.M. P&P | X | | | | X |
| NFPA 70E Program Merge with ELECTRICAL | | | | X | |
| Nitrogen Awareness | X | | | | X |
| Office Safety P&P | X | X | X | X | X |
| Pollution / Spill Response P&P | X | X | X | X | X |
| PPE P&P | X | X | X | X | X |
| Preventative Maintenance P&P | X | X | X | X | X |
| Process Safety Management P&P | X | X | X | X | X |
| QA / QC P&P | | X | X | X | X |
| Railway Safety P&P | X | | | | |



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|--|---|---|---|---|---|
| Respiratory Protection P&P (Sandblasting & Painting) | X | | X | | X |
| Return to Duty P&P | X | X | X | X | X |
| Rigging & Lifting P&P | X | | X | X | X |
| Safety Audits & Inspections P&P | X | X | X | X | X |
| Safety Committee P&P | | | | | |
| Sandblasting & Painting P&P | X | | | | |
| Scaffolding & Ladder Safety P&P | X | X | X | X | X |
| Severe Weather P&P | X | X | X | X | X |
| Short Service Employee (SSE) P&P | X | X | X | X | X |
| Stop Work Authority P&P | X | X | X | X | X |
| Vacuum Truck Safety Program | | | | X | X |
| Vehicular P&P | X | X | X | X | X |
| Waste Management / RCRA P&P | X | X | X | X | X |
| Water Safety P&P | X | | | | |
| Work Permits P&P | X | X | X | X | X |
| HS&E Communication P&P | X | X | X | X | X |
| Drops – Falling P&P | X | X | X | X | X |



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APPENDIX IV – Annual HSE Improvement Plan

| Category | Improvement Opportunity | Plan Forward | Responsible Party | Target Date | Status | | | |
|--|--|--|-------------------------------|----------------------|---|---|---|--|
| #1 Leadership & Commitment | Continue to move forward with the implementation of the Safety Management System | Will hold quarterly meetings with various divisional managers by either skype, phone conference, go-to-meeting, etc. | Corporate Management | Quarterly | Holding meetings every two weeks with divisions by Skype. | Continuing to meet with divisions by Skype. Working out well. | Continuing to meet with divisions by Skype. Working out well. | |
| | | | | | | | | |
| #2 Policy & Strategic Objectives | Target ¼ of BBGCI policies for management review and approval. Review process will be on a four year cycle. | Will start reviewing policies during the 1 st quarter at the corporate safety meetings on the third Wednesday of every month. | Corporate Safety Committee | Ongoing | Completed reviewing 12 of 20 policies for the year. | Completed reviewing 16 of 20 policies and pushed them out to all locations. | Completed reviewing 20 policies and pushed them to locations. | |
| | | | | | | | | |
| #3 Organization, Responsibilities, Resources, Standards & Documents | Complete converting BBGCI policies to a document control format and uploading to iCloud for access by all employees. | In the process of converting policies to correct format and putting in cloud. | Corporate Safety & Consultant | 3 rd Qtr. | | Completed converting all policies to a document control format & uploaded to iCloud in April. | | |
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| Category | Improvement Opportunity | Plan Forward | Responsible Party | Target Date | Status | | | |
|--|---|---|---|-------------|--------|---|---|-----------------|
| | | | | | | | | |
| #4 Implementati on & Monitoring | SafeWork Suite to go fully functional July 1, 2015 Expect 50% participation rate to expected performance target to start and then achieve a 75% participation rate by the end of 2015. | Hold meetings with various divisions to show capabilities of tool and review YouTube videos. | Corporate HSE | Ongoing | | As of 6/25/15 we have 51.8% participation | As of 9/30/2015 we have a 70% participation | |
| | | | | | | | | |
| #5 Audit | Conduct divisional audits for continuous improvement opportunities. | Will conduct an annual audit of each division for improvement opportunities and identify inputs into 2016 HSE objectives. | Corporate HSE and Local Field Safety Coordinators and local management. | Ongoing | | Completed one divisional audit in May. ND | 3 audits done. | ALL audits done |
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APPENDIX V – Training Matrix

| Training | Job Classifications | | | | | | | | | | | |
|---|---------------------|----------|----------------|--------|-----------|--------------------------|----------------------|------------|------------------|------------------|-----------------------|----|
| | Deckhand | Dispatch | Dredge Laborer | Driver | Leaderman | Operator (All Equipment) | Pile Driving Laborer | Supervisor | Tug Boat Captain | Upper Management | Yard/Dry Dock Laborer | |
| Access To Medical Records (Policy) | X | X | X | X | X | X | X | X | X | X | X | X |
| Accident Investigation | | | | | X | | | X | | X | | |
| Aerial Manlift | | | | | | X | | | | | | X |
| Alcohol & Drug Awareness (Policy) | X | X | X | X | X | X | X | X | X | X | X | X |
| Attitude/ Attendance (Policy) | X | X | X | X | X | X | X | X | X | X | X | X |
| Accident/ Incident Investigation (Policy) | | | | | X | | | X | X | X | | |
| Basic First Aid/ CPR | AS | X | AS | | X | AS | AS | X | X | AS | AS | |
| Berry Brothers Orientation | X | X | X | X | X | X | X | X | X | X | X | X |
| Bloodborne Pathogens Awareness | X | X | X | X | X | X | X | X | X | X | X | X |
| Confined Space E/A | AS | | AS | | AS | AS | AS | AS | AS | | | X |
| Confined Space Rescue | AS | | AS | | AS | AS | AS | AS | AS | | | X |
| Confined Space Safety Awareness | AS | | AS | | AS | AS | AS | AS | AS | | | X |
| Core Compliance- PEC | X | X | X | X | X | X | X | X | X | X | X | X |
| Defensive Driving | AS | AS | AS | X | AS | AS | AS | X | X | X | X | AS |
| Disciplinary Policy Procedures (Policy) | X | X | X | X | X | X | X | X | X | X | X | X |
| DOT Drug & Alcohol Awareness | | | | | X | | | X | X | X | | |
| Electrical Safety Awareness | X | X | X | X | X | X | X | X | X | X | X | X |
| Emergency Response Awareness (Policy) | X | X | X | X | X | X | X | X | X | X | X | X |
| Environmental Spill (Policy) | X | | X | | X | X | X | X | X | X | | X |
| Ergonomics and Back Safety (Policy) | X | X | X | X | X | X | X | X | X | X | X | X |
| Everyday Leadership | | | | | X | | | X | X | X | | |
| Fall Protection Awareness (Policy) | X | | AS | | X | X | X | | | | | X |
| Fire Prevention Awareness (Policy) | X | X | X | X | X | X | X | X | X | X | X | X |
| Forklift Certification (3 Years) | AS | | AS | | | X | X | | | | | X |
| Friction Crane Operator (4 Years) | | | | | | X | | | | | | |
| General Safety Rules (Policy) | X | X | X | X | X | X | X | X | X | X | X | X |
| Global Harminization (Policy) | X | X | X | X | X | X | X | X | X | X | X | X |
| Hand & Power Tool Safety (Policy) | X | X | X | X | X | X | X | X | X | X | | X |
| Hearing Conservation (Policy) | X | X | X | X | X | X | X | X | X | X | | X |
| Housekeeping (policy) | X | X | X | X | X | X | X | X | X | X | X | X |
| Hydrogen Sulfide Awareness (Policy) | X | | X | | X | AS | X | X | X | X | | X |
| Job Safety Analysis (Full Training) | | | | | X | | | X | | | | |
| Job Safety Analysis (Policy) | X | X | X | X | X | X | X | X | X | X | X | X |
| Ladder Safety (Policy) | X | X | X | X | X | X | X | X | X | X | | X |
| LOTO Safety (Policy) | X | X | X | X | X | X | X | X | X | X | | X |
| Personal Protective Equipment (Policy) | X | X | X | X | X | X | X | X | X | X | | X |
| Rigging API (4 Years) | X | | | X | X | X | X | X | | | | X |
| Shipyards Competent Persons (3 Years) | | | | | | | | | | | | X |
| Short Service Employee Process (Policy) | X | X | X | X | X | X | X | X | X | X | X | X |
| Stop Work Authority (Policy) | X | X | X | X | X | X | X | X | X | X | X | X |
| Workplace Harassment/ Violence (Policy) | X | X | X | X | X | X | X | X | X | X | X | X |

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APPENDIX VI – List of Referenced Policies

- SWP 002 – Incident Report
- SWP 003 – Incident Investigation
- SOP 004 – Air / Gas Contaminants
- SWP 008 – Behavior Based Safety
- SWP 016 – Contractor / Subcontractor
- SWP 018 – Disciplinary Policy
- SWP 044 – Competency Program
- SWP 045 – JSEA
- SWP 073 – Stop Work Authority
- SWP 079 – HSE Communication Policy