



13 June 2020

From: James Boomer, Director of Subcontracts

To: Colonna's Subcontractors

Subj: Colonna's Shipyard's Subcontractor Safety Policy

Valued Partners,

Colonna's Shipyard Inc. is dedicated to providing a safe working environment for our employees, customers, and subcontractors. We work hard to keep Colonna's Shipyard safe, and we expect our subcontractors to do the same. As a result, Colonna's Shipyard has implemented the following Subcontractor Safety Policy.

All personnel working at Colonna's Shipyard, whether employed by Colonna's, or our subcontractors, are required to abide by any and all applicable safety regulations. Safety regulations consist of, but are not limited to:

- The regulations set forth in the Colonna's Subcontractor Safety Orientation presentation
- All applicable Occupational Safety and Health Administration (OSHA) regulations
- Any requirements of the owner of the vessel on which the work is to take place
- Any requirements of the subcontractor's purchase order, or flowdowns therein

It is the responsibility of the subcontractor to ensure they are aware of all safety requirements related to the work they are to perform. Colonna's Safety Department is available as a resource if safety regulations are in question, but we expect each subcontractor to regulate and monitor their employees and their work.

If any subcontractor has repeated safety issues or warnings, fail to adhere to shipyard or regulatory polices, or creates an unsafe working environment for others, they may be deemed as a "High-Risk Subcontractor". The designation of High-Risk Subcontractor may be based on the type of work typically performed, past work history, work environment risk, or any other factor. The designation is solely at the discretion of Colonna's Shipyard. Colonna's Subcontracting Department will officially notify any subcontractors designated High-Risk. The High-Risk designation will stay in effect until such time that Colonna's Safety Department deems the designation can be removed.

If a subcontractor designated as High-Risk receives 3 major or 10 minor documented safety infractions in a 6 month period, or fails to correct an identified hazard, Colonna's Shipyard may suspend the subcontractor from the yard, and deny any new work to them for a period of 3 months or longer. Examples of major infractions are, but are not limited to, hot work without a firewatch where one is required, entry into a confined space without a Marine Chemist certificate or SCP Log of Inspections, or deliberate override of equipment safety features. Examples of a minor infraction are, but are not limited to, improper or lacking PPE, dangerously unkempt workspace, use of improper or unauthorized



equipment, or excessive driving speed in the yard. Individual subcontractor employees may be issued suspensions of varied durations for specific safety violations.

Prior to re-instatement, a suspended subcontractor will need to develop, present, and implement a safety plan that addresses the issues leading to suspension. Once reviewed and accepted by Colonna's Safety department, the subcontractor will be eligible for re-instatement.

It is the subcontractor's responsibility to ensure all their employees are aware of and trained to abide by Colonna's safety rules and OSHA regulations. Each subcontractor will be held accountable for the behavior of their employees. This policy must be acknowledged, signed, and accepted by a responsible party for the subcontractor prior to issuance of any purchase orders.

In an effort to increase safety awareness at Colonna's Shipyard, our Safety Leadership Team (SLT) has implemented the "Good Catch" program. The Good Catch program is the focus of Colonna's Safety policy. Everyone at Colonna's Shipyard is responsible for their safety, and the safety of their co-workers. We encourage everyone working at Colonna's to actively participate in making the shipyard the safest workplace possible. The slogan of the Good Catch program is, "If you see something, say something." In various locations around the shipyard, you will see placards showing that slogan and a QR code. If the QR code is scanned with a smart device, it will take the user to a form where they can report safety concerns or positive reports to the SLT. It is our hope that if anyone sees a safety concern, they will intervene to stop the unsafe behavior, then use the Good Catch QR code to report on the safety situation. Stopping the unsafe situation is critical to the safety of the individuals involved, and reporting the incident is critical in preventing similar incidents in the future. The Good Catch program applies to everyone at Colonna's Shipyard, including our subcontractors. Everyone can utilize the Good Catch QR code, and are encouraged to do so.

Very Respectfully,

A handwritten signature in black ink that reads 'James Boomer'.

James Boomer
Director of Subcontracts

I hereby sign and accept the terms of Colonna's Subcontractor Safety Policy on behalf of my company and agree to abide by the provisions therein.

Company

Name

Signature

Title

Date