

NORTH ATLANTIC SHIP REPAIR LLC

SUBCONTRACTOR SAFETY REQUIREMENTS

General Requirements

The management of North Atlantic Ship Repair LLC (NASR) and its subsidiary companies (Boston Ship Repair LLC and Philadelphia Ship Repair LLC) is committed to the maintenance of adequate standards of personal safety and health at all NASR facilities. Subcontractors and their employees are expected to be trained and act in accordance with 29 CFR 1915, OSHA Standards for Shipyard Industry, 29 CFR 1910, OSHA Standards for General Industry, and any other local, state or federal regulation applicable to the task they are accomplishing. Upon request by NASR, the subcontractor shall provide training records or proof of current training. Subcontractor's supervisors are expected to conduct their own hazard assessment and use appropriate safe work practices. It is the responsibility of Subcontractors supervisory personnel to ensure that their workers have been adequately trained per OSHA requirements and briefed on safe work practices / rules prior to starting work on any NASR property or on vessels under NASR control.

Safety Rules

Personal protective equipment including ANSI approved hard hats, safety glasses with attached side shields, and composite/steel-toed safety shoes will be worn in all production areas. Other protective equipment specific to type of work or hazards in the work area (e.g., USCG approved flotation devices, fall protection equipment, goggles, hearing protection, respiratory protection, etc.) will be worn when necessary.

Durable and fitted work clothing shall be worn. Clothing such as shorts, floppy sleeves, tank tops, and other abbreviated clothing shall NOT be worn.

Smoking is permitted only in designated areas and NEVER on vessels. Smoking is NOT permitted inside any office or break areas, or while operating any mobile equipment.

Subcontractor is not to perform hot work such as cutting, welding, grinding, or braising without prior permission of a Marine Chemist and after obtaining a Hot Work Permit. No burning, welding, or heating shall be done on any bulkhead or deck section until the existing conditions beyond or below the point of work have been thoroughly checked and certified safe by a marine chemist or competent person, as required.

Subcontractor employees shall not operate NASR owned, leased or rented cranes, forklifts, aerial work platforms, floating equipment or any other equipment unless they are qualified to do so and authorized, , by NASR supervisory personnel.

Subcontractor employees are expected to always understand and follow the applicable NASR Lock Out/Tag Out procedures. A copy of this procedure can be obtained from the NASR Safety Department.

Subcontractor employees are expected to understand and follow the applicable NASR Confined and Enclosed Space safe work procedures at all times. A copy of this procedure can be obtained from the NASR Safety Department. Where a gas-free condition is required for

work in an area, such condition must be always maintained. If the gas free condition is lost for any reason, it must be reported immediately to the NASR Safety Department or Project Manager / Coordinator.

Good housekeeping shall be always maintained in all areas. Designated roadways, walkways and fire lanes shall be always clear. Subcontractors must clean their work area of trash, scrap, debris, and miscellaneous equipment at the end of each shift and upon completion of the job.

All accidents involving injuries and/or damage to NASR property or equipment must be reported to the NASR Safety Department immediately. Written accident reports must be submitted as soon as practical, but no later than 24 hours from the time of incident.

If a Subcontractor employee is injured while executing the contracted work, the Subcontractor is fully responsible for attending to the injuries and for payment of any subsequent costs that may be incurred because of such injuries (i.e., emergency medical treatment, ambulance services, hospitalization, etc). All invoices received by NASR, for such costs, will be forwarded to Subcontractor for payment and the creditor will be notified of your liability regarding payment.

Each subcontractor shall ensure their employees including their subcontractors have read and understand these safety rules before any contractual work is performed. NASR's prime subcontractors are responsible for environmental, safety and health compliance by their subcontractors.

Covid - 19

NASR has adopted and maintains a Coronavirus (COVID-19) Exposure Prevention, Preparedness, and Response Plan that is updated routinely in accordance with CDC, OSHA, and State Public Health Agency guidance is amended. It is the responsibility of the Subcontractor to review the most recent update to NASR's plan and to follow the guidance presented in the plan. In accordance with the plan, subcontractor will comply with the Plan, including but not limited to the following:

- Subcontractor will provide training to all its employees about COVID-19, how it spreads, and how to protect themselves from the virus;
- Subcontractor will require all its employees to maintain a minimum distance of six feet from all other persons in the shipyard, including at all trainings, mealtimes, and breaks. The only exception is when actively working a repair item and six feet cannot possibly be maintained. Personnel shall be rotated in and out to alleviate exposure time;
- Subcontractor will require its employees to stagger breaks and mealtimes;
- Subcontractor will require all its employees and visitors to the shipyard to fully complete the daily shipyard attendance log;
- Subcontractor will provide all PPE required by the Plan to Subcontractor's employees attending the shipyard and will either daily take its employees temperature or require that employees do so;
- Subcontractor will require Subcontractor's employees to wear the required PPE (mask) at all times in the shipyard;
- Subcontractor will provide employees with a thermometer for their individual use or will make one available on site along with disinfecting materials and instructions;
- Subcontractor will pose to each employee each day all the health questions if required by the State or local health department and will send home any employee who fails the questionnaire;

- If appropriate PPE can't be provided, or if the employee has a temperature of 100.4 or higher, Subcontractor agrees to send its employees home from the shipyard;
- Subcontractor will monitor Subcontractor's employees for signs of COVID-19;
- Subcontractor will require its employees to immediately report any known or suspected cases of COVID-19 in the shipyard to NASR management; and
- Subcontractor will set a good example by following the Plan at all times.
- Subcontractors outside the local areas as designated in the Plan shall be required to obtain a negative COVID-19 test within 72 of entering the facility at the beginning of each individual vessel repair period.

Fire Safety Plan

The NASR companies maintain a Fire Safety Plan, which can be obtained, upon request, from the NASR Safety Department. It is the responsibility of Subcontract employers to establish and maintain a fire safety plan, which complies with the applicable NASR Fire Safety Plan. A copy of same must be provided prior to starting work on any NASR facility.

The following is a list of potential fire hazards that may be encountered at NASR companies: Hot work, fuel gas and oxygen supply lines and torches, storage, and handling of flammable or combustible liquids, storage and handling of compressed gases, and electrical hazards.

NASR companies have a variety of fire protection equipment and systems located throughout its facilities. The following is list of fire protection control measures available at our facilities: Portable fire extinguishers and hoses, fire hydrants, fixed extinguishing systems, raw water system pumps, and an established response protocol with the local Fire Department.

Subcontractor's employees are expected to understand and follow applicable evacuation procedures. Emergency evacuation routes are conspicuously posted throughout the facilities. In the event of evacuation, personnel will select the closest exit not affected by the emergency. Designated areas have been assigned for personnel to assemble. In the event personnel must exit a vessel, the designated area will be at the end of the gangway / pier or craft shop.

It is the subcontractor's responsibility to provide NASR companies with any known fire related hazards within the scope of work being performed. It also the subcontractor's responsibility to notify NASR companies of any unknown hazards discovered during the course of their work.

Hazard Communication Program

The NASR companies maintain a hazard communication program in accordance with 29 CFR 1915.1200 (identical to 29 CFR 1910.1200) as updated March 26, 2012. The program requires each facility to maintain a listing of hazardous chemicals within the facility and the corresponding Safety Data Sheets (SDS). Said hazard communication program, listing of hazardous chemicals, and/or SDS can be made readily available to any Subcontractor employee upon request to any NASR supervisory personnel.

Each container of hazardous chemical at NASR shall be labeled, tagged, or marked with the identity of the hazardous chemical(s) contained therein; and appropriate hazard warnings, or alternatively, words, pictures, symbols, or combination thereof, which provide at least general information regarding the physical and health hazards of the hazardous chemical(s). Signs, placards, process sheets, batch tickets,

operating procedures, or other such written materials in lieu of affixing labels to individual stationary process containers may be utilized, as long as the alternative method identifies the containers to which it is applicable and conveys the aforementioned information be on a label. The written materials shall be readily accessible to all employees in their work area throughout each work shift. Labeling of portable containers into which hazardous chemicals are transferred from labeled containers, and which are intended only for the immediate use of the employee who performs the transfer, is not required. Existing labels on incoming containers of hazardous chemicals shall not be removed or defaced, unless the container is immediately marked with the aforementioned information. All labels or other forms of warning shall be legible, in English, and prominently displayed on the container, or readily available in the work area throughout each work shift. Subcontractors having employees who speak other languages may add the information in their language to the material presented, as long as the information is presented in English as well.

When applicable, NASR supervisory personnel will inform the prime contractor's supervisor / point of contact of any precautionary measures that need to be taken to protect their employees during NASR's normal operating conditions and in foreseeable emergencies. Prime contractors must inform NASR supervisory personnel of any precautionary measures that need to be taken to protect our employees during their normal operating conditions and in foreseeable emergencies. This information may be communicated verbally, in writing, and/or by posting appropriate warning signs in the work area(s). It is the responsibility of the prime contractor to notify its employees and tier subcontractors of this information.

If Subcontractors contract requires that hazardous chemicals be transported onto NASR properties, Subcontractor must first receive permission from the NASR Safety Department. When requesting permission, Subcontractor must provide a list of the hazardous material to be used to the NASR Safety Department.

Once Subcontractor is granted permission to transport the chemicals onto the NASR premises, Subcontractor shall be responsible for the safe storage and handling of these chemicals on site pursuant to applicable regulatory requirements. Disposal of the chemicals and any air emission reporting requirements must be in accordance with applicable federal, state and local laws.

If any subcontractor activity will result in any hazardous waste being generated, prior arrangement for disposal shall be made with the NASR Safety Department.