



Gulf of Mexico Offshore Access Policy

1. Policy Statement

BP's Gulf of Mexico ("GoM") offshore assets present very unique challenges from an operational and security standpoint. These challenges require special measures to respond to BP employees and employees of contractors who engage in conduct which is disruptive and/or presents safety risks to other personnel working offshore. Under this Offshore Access Policy ("Policy"), BP employees and the employees of contractors, may be removed from any offshore facility and restricted from returning to any BP project or BP managed jobsite.

2. Enforcement Guidelines

Any individuals removed from a GoM site shall be included on a *Prohibited Access List* pursuant to the following guidelines.

2.1 Applicability

These guidelines apply to all offshore BP projects, jobsites and supporting on-shore facilities in the GoM and to all BP employees and BP contractor employees, physically working on those projects and jobsites. All workforce transiting the heliport, regardless of role, are included in the selection pool for random substance testing.

2.2 Monitoring

Any individual involuntarily removed from any offshore BP project or jobsite will be reported to the Director of Security. Their names will be placed on a Prohibited Access List and provided to BP's offshore logistics group. The List will include the person's name, the BP contact for reinstatement and the date that access rights were revoked. Any individuals whose names are on the List will be denied access to the requested transportation, until written clearance and authorization is provided by the BP offshore logistics group and an authorized BP representative.

All information will be kept confidential and will only be released to authorized personnel.

Communication of Violations

Any member of the workforce in violation of this policy will be denied access to BP owned or operated facilities

- BP's designated drug and alcohol testing contractor will be responsible for notification of the contractor company when an individual employed by that contract company has a non-negative drug test or a positive alcohol test.
- The heliport dispatcher will be responsible for notification to the facility affected
- Other violations will be communicated to contract companies by the GoM Director of Security or designee

GoM Regional Substance Abuse Policy: Addendum to BP Drug & Alcohol Misuse Policy (US)

The GoM Regional addendum to the BP Drug & Alcohol Misuse Policy (US) defines the policy requirements specific to the GOM Region and their appropriate placement within the BP Drug & Alcohol Misuse Policy (US).

Per BP Drug & Alcohol Misuse Policy (US), Appendix C #1, the Designated Employee Representative (DER) is the custodian of the Drug & Alcohol Misuse Policy (US).

BP Drug & Alcohol Misuse Policy (US) Appendix C #6 requires security to assist in the determination of whether an employee is on a controlled substance, to deny access to workers reasonably suspected to be using a controlled substance, and to find adequate transportation for impaired individuals. In addition, in the Gulf of Mexico (GoM), BP GOM security will coordinate canine and bag searches and liaison with law enforcement.

Prohibited Substance Testing

Policy Statement

The use, possession, concealment, transportation, promotion, or sale of the following substances is strictly prohibited on Company premises, including all property owned, operated, leased by, or under the control of Company, as well as on the location of *any* authorized Company Project, regardless of the physical location where such work is performed.

- Prohibited substances are defined as: (a) any alcoholic beverage, the use of which is not authorized by the Company, (b) any substance that an individual may not sell, possess, use, or distribute under federal or applicable state laws, and (c) any otherwise legal but illicitly-used substances.

"Otherwise legal but illicitly-used substances" include (a) prescription drugs obtained without proper medical authorization, and (b) prescribed drugs, over-the-counter drugs, and other substances not being used for their intended purposes or at intended dosage. (c) illegal synthetic drugs

- Drug paraphernalia and similar items used for substance abuse are likewise prohibited on Company Projects or premises.

*In many contracts, Company reserves the right to remove a contractor's employees for any reason. In no way does this policy detract from that right.

Contraband

Searches and Inspections

Company reserves the right at all times to conduct unannounced substance screens, searches, and inspections of contractors, contractors' employees, and other persons, including their effects, lockers, baggage, desks, tool boxes, clothing, and vehicles located on Company property or worksites, as a means of enforcing this Policy

Any controlled substances or items prohibited by this Policy, or any materials that are illegal to possess, may be retained by Company and may be destroyed or turned over to the appropriate law enforcement agency.

Prohibited items including GOM Contracted Aircraft Guidelines of Prohibited Items

- Illegal drugs, drug-related paraphernalia, drugs not in original containers
- intoxicating beverages

-
- firearms, firearm parts, ammunition, explosive devices, explosive device material
 - Non-Lethal items such as brass knuckles and stun guns. Illegal knives and multi-purpose tools (excluding work knives that are in checked baggage)
 - pornographic materials
 - Hazardous materials
 - Mace, tear gas, and other irritants
 - Propane, butane lighters or refills
 - No articles that may pose a hazard to personnel conducting baggage searches or transportation

Note: The list is not all-inclusive and you should consult the aviation service provider or GoM Director of Security, Air Operations Supervisor, or Aviation Planner for specific hazardous material shipment information.

The refusal of any person to submit to a search or inspection will result in the revocation of the person's access privileges.

Prohibited Access List

Whenever a member of the workforce is prevented from traveling to an offshore site because of a non-negative drug screen or a positive alcohol test he will have his/her name automatically removed from the flight manifest and added to the Prohibited Access List. Upon confirmation of a negative drug test by the contracted lab, the person's name will be removed from the Prohibited Access List and be eligible to fly.

Whenever there is a confirmed positive result under the Off-Shore Drug & Alcohol Policy, the Contractor's name will be added to the Prohibited Access List for a period of no less than one year.

All Other Violations Whenever a member of the workforce is removed from a BP offshore property for any reason other than a Substance Abuse Violation, the individual's name shall be communicated to the GoM Director of Security who will determine placement on the Prohibited Access List

2.3 Requests for Reinstatement – All Violations

A request for reinstatement of contractor access privileges may be made after one year upon request of the employing contractor. Such requests should be made to the BP GoM Director of Security for an evaluation on a case-by-case basis. For Drug & Alcohol violations a request will be granted only after the employee has successfully completed an evaluation by a substance abuse professional and recommendation made to return to work and a drug screen conducted within not more than thirty (30) days prior to the date of the request. In addition to any requirements for reinstatement imposed by this Policy, the employee must also meet all other BP requirements for travel to offshore jobsites.

3.0 Contractor Background Screen

3.1 Applicability

Effective March, 2014 the Contractor Background Screen Policy was adopted by the Gulf of Mexico.

All PERSONNEL who perform WORK for COMPANY must have undergone a background check that meets the following minimum Basic Background Check requirements within the ninety (90) days prior to the date they begin performing WORK for COMPANY. PERSONNEL shall not be permitted to provide WORK to COMPANY if:

- PERSONNEL’S background check results do not meet these minimum requirements (regardless of when the background check occurred);
- PERSONNEL’S background check results are deemed unsatisfactory by CONTRACTOR; or
- PERSONNEL’S falsifies background information.

Background checks for PERSONNEL must be conducted and successfully passed before PERSONNEL are placed with COMPANY.

3.2 In Scope

This policy applies to all contractors, subcontractors (existing and new) working off shore in the Gulf of Mexico (GoM) for Global Operations Organization (GOO), Global Projects Organization (GPO) and Global Wells Organization (GWO). Exceptions may be granted by the Director of Security.

Revision Date	Authority	Custodian	Revision Details
06/01/08	GoM HSSE Director – Curtis Jackson	Greg Lynch, Business Security Manager – GoM SPU	Issued for use.
09/21/2012	Vp S&OR	GoM Director of Security	Updated HSSE Director to VP S&OR Changed reporting requirements to Director of Security Added Completion of Drug Rehabilitation program to match Contractor Substance Abuse Policy
10/28/2013	VP S&OR – Cindi Skelton	Gom Director of Security – Christine Curtis	2.1 Clarified Applicability 2.2 Updated Monitoring to include I-Logistics Updated Gom Bp Drug & Alcohol Policy to make the Designated Employee Representative the custodian of the Drug & Alcohol Policy. Clarifies Security Role Added Communication section defining roles Added section for HR to request placement of Bp employees on Prohibited Access List Updated contraband items

7/30/2014	Christine Curtis, Director of Security GOM	Joe Wein Security Coordinator	Changed document authority from VP S&OR to Director of Security GoM.
4/1/2016	Reviewed by Farley Burge, BP Legal		
04/01/2016	Christine Curtis, Director of Security GoM	Joe Wein, Security Coordinator	Removed last two lines under Policy Statement Removed all of Enforcement Guidelines except for the last line Eliminated wording of subcontractors, vendors from document Removed all of Prohibited Access List except for last line Updated Communication of Violations Removed last line of Prohibited Access List Removed last paragraph of All other Violations
02/21/2017	Christine Curtis, Director of Security GoM	Christine Curtis	Reviewed. No revisions
10/12/2017	Christine Curtis, Director of Security	Christine Curtis	Added Contractor Background Screen Requirements