

Gulfof**Mexico**



GoM Security

GoM Unavailable to Work
For BP List
(NFL)

Unavailable to Work for BP List

“No Fly”

Introduction

bp’s Gulf of Mexico (GoM) offshore assets present unique challenges from an operational and security standpoint. These challenges require special measures to quickly address bp employees and workers of contractors who engage in conduct which may be disruptive and/or present safety risks to themselves or other personnel working offshore.

Under the Offshore Access Policy, bp employees and the employees of contractors, subcontractors and vendors may be removed from any offshore facility and restricted from returning to any onshore or offshore bp project or bp managed job site. Such restrictions will be used in situations where an individual has engaged in a violation of any bp rule, bp policy or practice, bp Code of Conduct violation for which he/she has been removed from or prevented from accessing the bp project or jobsite.

1.0 Medical Removals and Placement on the *Unavailable to Work for bp List*

Individuals working on an offshore bp asset may be removed and temporarily placed on the *Unavailable to Work for bp List* for medical reasons by bp Occupational Health and contracted offshore medics only. Medical removals do not include removals for drug & alcohol violations (see Section 3.1 below). Contracted offshore medics must inform bp Occupational Health as soon as possible once they place an individual (bp employee, contractor or vendor) on the *Unavailable to Work for bp List*. Bp Occupational Health is responsible for working with the bp employee and his/her medical providers to determine if and when the employee is fit for duty and should be taken off the *Unavailable to Work for bp List*. For contractor and vendor staff, bp Occupational Health should work with the contract or vendor company to help make this determination. No individual (bp, contractor or vendor) should be permanently placed on the *Unavailable to Work for bp List* for a medical reason without first consulting with bp Legal. Bp Occupational Health is responsible for conducting reasonable reviews based on the particular medical situation of the individual at the request of individual (or their employer) for any individual permanently placed on the *Unavailable to Work for bp List*. No individual should be prevented from working for GOM (or any bp) onshore facility or site solely based on their temporary or permanent placement on the *Unavailable to Work for bp List* based on a medical removal from an offshore facility. The individual’s ability to work for an onshore facility or site must be separately evaluated.

2.0 Enforcement Guidelines for Non-Medical Placements on the *Unavailable to Work for bp List*

The ability to monitor and enforce any restrictions of personnel from accessing an offshore project or jobsite is challenging, due in part, to the number of contract companies being used offshore and the competitiveness of the market for labor. Specifically, it is possible for a person working on a bp project to end his employment with one contractor and shortly thereafter join another contract company who

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assigns him to the same or different bp project or jobsite. In those cases, if the person has been denied access to the offshore environment while employed with his first employer, the second contracting company may not be aware of the restriction and of its obligation to apply for reinstatement for the person with bp. To resolve this issue and for better enforcement of this provision of the policy, any individual removed from a GoM site shall be included on an *Unavailable to Work for BP list* pursuant to the following guidelines.

2.1 Applicability

These guidelines apply to all offshore bp projects, jobsites, and supporting onshore facilities in the GoM and to all bp employees and contracted workforce, 3rd parties, and vendors physically working on these projects and jobsites.

2.2 Authorization to Place on the Unavailable to Work for BP List

Those authorized to recommend personnel to be placed on the *Unavailable to Work for bp List* are:

- a. Regional Leadership Team members, i.e. Senior VP of GoM, VP Operations, VP Wells and VP People and Culture
- b. GoM Director of Security
- c. Operation Installation Managers (OIM)
- d. bp Medical Personnel or contracted offshore medics for medical concerns only (see 1.0 above)
- e. bp Legal
- f. bp Business Integrity Team
- g. bp People & Culture

Although the above individuals can all recommend placement on the *Unavailable to Work for bp List*, only the GoM Director of Security can put someone on the list.

2.3 Monitoring

Any individual removed from any bp project or jobsite for a suspected violation of any bp rule, policy or practice, or bp Code of Conduct will be reported to the Director of Security and their name will be placed on the *Unavailable to Work for bp List*. This list will include: the date of the alleged offense, the person placing an individual on the list, the person's name, company, and description of the suspected concern. The Director of Security will be responsible for maintaining the *Unavailable to Work for bp List* in Helipass. Any individuals' names on the *Unavailable to Work for bp List* will be denied access to any bp GoM facility or project until written clearance and authorization is provided to the GoM Director of Security.

All entries into the *Unavailable to Work for bp List* that reflect a potential violation of any bp rule, policy or practice, or bp Code of Conduct will be entered by the GoM Director of Security into the Concern

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Report Form where a review will be conducted, and potential investigation initiated. A monthly report summarizing the suspected violations along with a name of the involved contracting firm (but excluding the involved individual's name) added to the *Unavailable to Work for bp List* will be submitted to Business Integrity. The monthly report to Business Integrity will not include individuals who were removed for medical concerns.

2.4 Communication of Potential Placement

Any bp employee or contract worker placed on the *Unavailable to Work for bp List* for a suspected violation of any bp rule, policy or practice, or bp Code of Conduct will be denied access to work on bp GoM projects, bp GOM owned or operated facilities. The individual may only be removed from the *Unavailable to Work for bp List* upon notification by the GoM Director of Security.

The Contracted Drug & Alcohol vendor will be responsible for notification to the contracting company when an individual has a non-negative drug test result or a positive alcohol test.

The Heliport Dispatcher will be responsible for notifying offshore facilities when personnel scheduled to fly to an offshore facility have been denied access.

The Director of Security will notify the Assigned CAM or procurement specialist of potential violations of any bp rule, policy or practice, or bp Code of Conduct.

All potential violations of any bp rule, policy or practice, or bp Code of Conduct will be communicated by the CAM/ procurement specialist by a letter sent to the contracting company. (See attachment A)

3.0 Violations of bp rule, policy or practice, or bp Code of Conduct

3.1 Drug & Alcohol Violations (GoM)

Drug & Alcohol Policy (Attachment B)

Potential violations of the bp Drug & Alcohol Misuse Policy by a bp employee will be reviewed by bp P&C, in coordination with bp Occupational Health, as appropriate. The bp employee will be removed from duty until the investigation is complete. Confirmed violations of the Drug & Alcohol Misuse Policy by a bp employee may be subject to discipline in accordance with the bp Disciplinary Policy and Procedure and the bp Drug & Alcohol Misuse Policy.

Potential violations of the bp Drug & Alcohol Misuse Policy by a contract worker or vendor worker result in the worker being removed from bp's site until a review of the situation has been completed in accordance with the applicable contract between bp and the contractor/vendor and the bp Drug & Alcohol Misuse Policy.

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Confirmed violations of the bp Drug & Alcohol Misuse Policy by a contractor will result in the contractor being placed on the *Unavailable to Work for BP List* for a minimum of one year. At the end of one year, the contract company may request removal from the list after submitting a letter to the bp Medical Team with documentation of successfully completing a Substance Abuse Evaluation and having a negative drug and alcohol test within 30 days of submittal. The bp Medical team will review and if warranted, authorize the removal from the *Unavailable to Work for bp List*.

3.3 Safety Violations

A person can be placed on the *Unavailable to Work for bp List* for potential safety violations by those listed as authorized in Section 2.2 Authorization for Placement on *Unavailable to Work for bp list*. Typically, this is done by the OIM on an offshore installation. The individual who places a person on the *Unavailable to Work for bp List* shall also have the responsibility to notify the GoM Director of Security that the individual has been placed on the list.

After the Director of Security is notified, the Director of Security will temporarily place a person on the *Unavailable to Work for bp List* and will enter the information into the Concern Reporting Form. As a confirmed safety violation may result in disciplinary action for bp employees, P&C should be immediately contacted. Central HSE and BI (or the Regional Responsible Individual) will collectively determine whether an investigation into the potential safety violation is warranted. If an investigation is conducted and the concerns are substantiated, a decisionmaker meeting will be held with the appropriate parties, and in accordance with the relevant HSE and BI concerns management policies and procedures. If appropriate, a plan for reinstatement should be developed. Confirmed safety violations may result in an individual being terminated from bp employment and a permanent ban from working on offshore GoM facilities.

In the case of a contractor, the contracting company will be notified, and, depending on the issue, either bp or the contract company may need to conduct an investigation. Contract companies at all times determine disciplinary action; however, bp solely determines whether a contractor remains on the Unavailable to Work List. The contractor will remain on the *Unavailable to Work for BP list* until a review of the situation is complete. The contractor may not provide services to bp unless and until a suitable plan for reinstatement is accepted by bp. The authorized party placing the individual on the list must concur with the plan. Confirmed safety violations by a contractor may result in a permanent ban.

3.4 Weapons Policy

All issues regarding weapons at bp worksites are governed by the bp Workplace Violence Policy and the standards set forth in Attachment C.

Potential violations of the bp Workplace Violence Policy by bp employees shall be reviewed by P&C and GoM Director of Security. bp employees may be placed on leave until the potential violation has been fully reviewed. As well, bp employees will be placed on the *Unavailable to Work for bp List* by the GoM

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Director of Security until the incident has been reviewed. Confirmed violations of the bp Workplace Violence Policy by a bp employee will be subject to discipline in accordance with Attachment C. Eligibility for bp employees to be reinstated are dependent on the results of the investigation in consultation with P&C, Legal, and if necessary, Security.

Contracting companies will conduct their own investigation regarding potential violations of the bp Workplace Violence Policy; however, bp will provide assistance and cooperation as needed. Placement on the *Unavailable to Work for bp List* shall follow the standards set forth in Attachment C.

3.5 Contraband

A list of contraband can be found in the bp Logistics Offshore Policy, which includes but is not limited to items banned by the Federal Aviation Administration. Possession of illegal drugs, synthetic urine, and drug paraphernalia are covered in the BP Drug & Alcohol Misuse Policy. The bp Workplace Violence Policy and Attachment C govern potential disciplinary action for firearm parts, and ammunition.

Possession of contraband by a bp employee, contract worker, or vendor, may result in removal from a worksite or denial of boarding a helicopter for offshore travel. Possession of contraband may also result in the individual being placed on the *Unavailable to Work for bp List* until the situation has been resolved. The GoM Director of Security shall determine immediate steps in response to an incident involving possession of contraband. If a bp employee is involved in the possession of contraband issue, the issue may be referred to Business Integrity for further review, and the situation may be subject to discipline up to and including termination.

If a possession of contraband issue involves a contract worker or vendor, the contracting company will be notified, and, depending on the issue, either bp or the contract company may need to conduct an investigation. Contract companies at all times determine disciplinary action; however, bp solely determines whether a contractor remains on the Unavailable to Work List. The contractor will remain on the *Unavailable to Work for bp list* until a review of the situation is complete. The contractor may not provide services to bp unless and until a suitable plan for reinstatement is accepted by bp.

3.6 Ethics and Compliance

The OIM will have discretion to immediately remove an individual for potential violations of the BP Code of Conduct. The OIM will notify Security and People & Culture within 24 hours of such removal. Following removal for a potential violation of the BP Code of Conduct, the GOM Director of Security will place the individual on the *Unavailable to Work for bp List* and enter the incident into the Concern Reporting Form. The individual will remain on the *Unavailable to Work for bp List* until the concern has been reviewed. Eligibility to return offshore will be reviewed by the authorized person placing the individual on the list, People & Culture, Ethics and Compliance and if necessary, Legal.

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A substantiated bp Code of Conduct violation may result in discipline up to and including termination and/or a permanent ban from working on GoM offshore facilities.

If an alleged violation of the bp Code of Conduct involves a contractor, the contracting company will conduct an investigation with bp’s cooperation and assistance where necessary. Once the investigation is complete, the contracting firm shall consult with bp Business Integrity to determine whether the individual shall be precluded from working on a bp location or whether the individual is eligible to return to work on bp projects.

Any unsubstantiated claim will immediately remove the individual from the *Unavailable to Work for bp List*.

3.7 Security Issues

Security Issues such as theft, sabotage, or fighting may be considered a bp Code of Conduct Violation. As such, potential security violations will be entered into the Concern Reporting Form by the GoM Director of Security. A person will be placed on the *Unavailable to Work for bp List* until the incident is reviewed by the Business Integrity Team. If the incident is substantiated, this issue may result in discipline up to and including termination and/or a permanent ban from working on a bp project.

If the alleged security incident involves a contract worker, the involved individual will be placed on the *Unavailable to Work for bp list*. The contracting firm will conduct a review of the incident. Once the contracting firm completes their review, they may apply to bp to allow the person to return to working on bp projects. The contracting firm’s application will be reviewed by the GoM Director of Security, P&C, and Legal as appropriate.

4.0 Request for Removal from Unavailable to Work for bp List

Bp employees requesting a review of their status on the *Unavailable to Work for bp List* should contact bp People & Culture. bp employees that have been terminated for cause and placed on the Unavailable to Work for BP are ineligible for removal.

Contracting companies, after completing an investigation and, if warranted after taking corrective actions, may contact their CAM to request removal from the *Unavailable to Work for BP List*. The CAM, in consultation with the Business Integrity Team, Security, People & Culture, and, if applicable, Legal, will determine eligibility for removal from the *Unavailable to Work for bp List*.



No Fly Letter to Company.docx



Contractor Substance Abuse Po letter_ 020414.docx



Weapons Policy

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