



COMPANY POLICY

No: COM-01
Rev No: 01
Rev Date: 15.09.2025

SAFETY AND QUALITY POLICY

The company is committed to meeting the quality requirements of its clients by ensuring that the service it renders meets the requirements of the clients. The company will conduct its affairs in a safe, efficient and reputable manner in the best interests of its clients, company employees and the environment within the necessary resources. In offering its services, the Company will endeavor to ensure the quality of its management process and will not knowingly participate in any unsafe or illegal activity. The Company keeps its Quality Management efforts certified to ISO 9001 standard.

The Company recognizes that operation of ships is a risk-bearing venture and involves a risk to the health and safety of its employees, to third parties and to the environment. The Company aims to minimize these risks by:

- Conducting its affairs such that all decision risk based and take into account the safe operation of the ships under its control
- Ensuring that the ships being operated fully comply with Flag State and International Maritime Legislation regarding safety and environmental protection measures.
- Employing competent and suitably qualified personnel, who are able to supervise and carry out its operations safely, efficiently and in an environmentally friendly manner.
- Providing suitable training for personnel to ensure operating procedures (inclusive of onboard CMS Training, Drills, Self-Assessment, CBT Training) are understood and complied with.
- Monitoring the effectiveness of shipboard safety and environmental performance (Safety Meetings, Shipboard Management Meetings, Internal/ External Audits & Third Party Inspections) and the related procedures.
- Utilizing the accident and pollution prevention measures, by carrying out accident/ incident & near miss investigations and using the lessons learnt to prevent re-occurrence.
- Maintaining contingency plans to be used in the event of emergencies.

The Company will ensure that it keeps up with the ever-changing requirements for safety and environmental standards demanded in the maritime world by frequent review of its procedures and system and will revise and update its systems to keep abreast of these changes.

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Managing Director



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HEALTH & HYGIENE POLICY

It is the policy of the Company to ensure the best possible Occupational Health and hygiene conditions for the seafarers. The Company is committed to the continuous improvement of the Occupational Health and Hygiene system through the following:

- Identifying occupational health and safety risk;
- Seeking improvements of occupational health to ensure the prevention of injury and ill health in the working environment;
- Adopting a proactive approach to occupational health and involves employees in the development and implementation of procedures;
- Controlling and eliminating risks, to prevent accidents and injuries;
- Providing information, instructions and training to all to ensure that there is a high level of awareness amongst all employees;

The Company will ensure that all joining crew have been examined and declared “fit to join” by an authorised doctor and in addition, given all necessary vaccines in order to minimise the danger of bringing and spreading any diseases.

The Company believes that hygiene and preventive measures on board is the most important component of a good and healthy environment on board.

The Company emphasizes and pursues that all vessels maintain a very high hygiene level as this is the main safeguard in preventing the spread of disease. Good personal hygiene combined with clean accommodation areas is required for healthy living.

The company encourages proper routines concerning food preparation and storage of food in a clean and appropriate manner, together with a safe waste disposal regime. Further, drinking water storage tanks and systems shall be clean and well-maintained at all times.

The Company will secure full compliance with this policy through on-board inspections.

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Managing Director



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ENVIRONMENTAL POLICY

The Company recognizes environmental protection and management as one of its top priorities and that every effort will be made to conserve and protect the environment from marine, atmospheric and other forms of pollution. The Company operates a zero spill to the sea policy and it aims to eliminate the pollution possibilities at source by maintaining monitoring equipment to peak operating condition at all times and that high standards of safety and awareness are maintained both on board and ashore. The Company is also committed to the continuous improvement of methods used to carry out this aim.

The following types and sources of possible environmental pollution are recognized:

- Oil including oil and products carried as cargo, fuel or waste.
- Chemicals, liquefied gases and other noxious liquid substances carried as cargo in bulk and chemical waste.
- Garbage, including bio and non-biodegradable waste.
- Sewage
- Ballast water. This includes the possibility of aquatic organisms or water-borne pathogens being transported in ships' water ballast.
- Anti-fouling paints and their effect on shell fish and other aquatic life.
- Cargo Vapour Emissions including their toxic effect on health and climate.
- Exhaust emissions, including gases and unburnt hydrocarbon particles and their contribution to smog, acid rain and the greenhouse effect.
- Ozone depleting substances, particularly CFCs and Halon gases and their effect on global warming.
- Noise levels from machinery and its effect on ships' crews as well as on local populations.
- Office generated waste including paper waste and other wastes like printer cartridges, PCB's from computers etc. By adopting the procedures stated within the CMS the Company will
- Comply with the mandatory regulations using published Codes, Guidelines and Standards from Marine Organization.
- Operate its business ventures using the principles of efficiently using energy and materials.
- Ensure residual wastes are disposed in a safe and efficient manner complying with regulations in force.
- Promote environmental awareness by training its employees both onboard and ashore.
- Where ever possible follow the principle of recycling.
- Keep abreast of current environmental issues by coordinating an exchange of information with Classification Society.
- Monitor compliance of Company procedures using a well-defined Internal Audit Structure within the CMS.

Managing Director



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DRUG AND ALCOHOL POLICY

It is the Company policy to prevent the operation of ships in its fleet from being operated by persons under the influence of alcohol and drugs. The Company prohibits the unlawful possession and handling of drugs on its vessels. Any Employee found in breach of this policy will be dismissed. The Company subscribes to ZERO ALCOHOL policy for employees onboard its ships and also subscribes to the ExxonMobil D&A Blanket Declaration. Officers and ratings to observe a period of abstinence from alcohol prior to scheduled watch keeping duty or work periods with the objective to ensure that the blood alcohol content of the seafarer is theoretically 'zero' at time of commencing scheduled duty, in the event that they have consumed any beverage ashore.

Company has adopted "Zero Tolerance" of breach of Company's Drug and Alcohol Procedures. Violation of the Company's Drug and Alcohol Procedures shall be dealt with most severely.

The Company randomly arranges testing of personnel on board the vessels for drugs and alcohol.

The failure of any employee to comply with Company's Drug and Alcohol Policy and associated procedures will be grounds for strict disciplinary actions.

The Company co-operates fully with authorities in the fight against abuse, use of and transport of illegal drugs and alcohol.

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Managing Director



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JUST CULTURE POLICY

The Company recognizes the need to hold persons accountable for their actions but appreciates the fact that incidents do not always occur because of individual misconduct but can be a result of system or process failures.

This is the foundation of the Company's "Just Culture", which goes a long way to help achieve a positive Health and Safety environment across the company.

It is the Company's way of inculcating a questioning attitude, causing resistance to complacency and commitment to excellence, and fostering personal accountability and self-regulation in safety matters.

The Company's CMS clearly sets out the expectations for compliance with procedures in the workplace and provides a context for enforcing them. It recognizes behaviors which exceed Company expectations as well as those that fall below expectations

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SOCIAL MEDIA POLICY

The Company recognises that social interaction on the internet has now become an important and integral part of life and if used inappropriately, can pose significant business risks. This policy applies to all our staff, irrespective of Seniority, tenure including consultants and contractors. All staff have personal responsibility to ensure compliance with this policy, specifically aimed at social interaction such as Facebook, LinkedIn, Wikipedia, Twitter as well as platforms such as YouTube, Flickr, blogs, wikis and the ability to post or publish (e.g. pictures, audio, video, text) with other people on other websites .

The purpose of this policy is to ensure that all staff understand the limitations on their use of social media, whether used during or outside hours of work, the types of use of social media that could expose them and Company to legal liability. Public statements can create legal issues in a number of ways including being defamatory, breach of confidentiality, and infringement of intellectual property or amounting to unlawful harassment.

When using Social Media in Personal capacity, you should make it clear that you are speaking in your personal capacity and not as Company representative. If you choose to disclose your connection to us, then you must clearly and expressly state that your views do not represent those of Company. Make sure you're engaging in social media conversations the right way. Bear in mind when posting any social Media content or comment that they may be permanently and publicly available and that you may not be able to delete or remove them later. If you are unsure of the accuracy of your comments, do not publish them.

Do not post anything related to your colleagues or our clients, business partners, vendors or other stakeholders without their permission. Never use social media as a platform to harm, intimidate, insult, threaten, defame or embarrass others. Please remember that Company, our respective clients and individuals reserve on their own behalf the right to take appropriate action in court against any person that defames or attempts to defame them. You may not use the Company's Logo or post any of the company's confidential information without prior written consent.

You may not use our logo or post any of our confidential information without prior written information.

Information stored in our IT Systems belongs to us. You should have no expectation of privacy in any communication, document or conversation which you send or receive. We may intercept, monitor and read any information or activities using our IT systems. The company monitors the frequency, location and duration of employee's use of social media in a workplace.

If you find hurtful or defamatory comments about the Company on social media forums, help us combat such negativity by informing Management who can respond appropriately. If an incident has occurred onboard a Company vessel, no information or pictures related to an incident shall be posted on any social media site as this may unnecessarily interfere with the investigation process.

Please ensure that social media is used in a responsible manner such that it does not interfere with critical tasks such as navigation. Furthermore, rest must not be compromised as a result of social media activity.

Staff who breach this policy may be subject to disciplinary action. We may amend this policy at any time, in our absolute discretion.

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Managing Director



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ANTI BRIBERY AND CORRUPTION POLICY

The Company is committed to ensuring that its employees will not engage in bribery or any form of unethical inducement or payment, regardless of the legal jurisdictions we are operating from. This policy provides guidance so that employees are able to meet these principles and comply with both the requirements of the UK Bribery Act and the US Foreign Corrupt Practices Act and any other law regulating business conduct.

Senior Management are accountable for implementing and enforcing this policy.

The UK Bribery Act 2010 and the US Foreign Corrupt Practices Act 1977 create offences and penalties for bribery and corruption. The UK Bribery Act 2010 creates a corporate offence of failure to prevent bribery, and requires The Company to implement 'adequate procedures' to prevent bribery

For the purposes of this policy, bribery occurs when one person offers, pays, seeks or accepts a payment, gift, favour, or a financial or other advantage from another to influence a business outcome improperly, or to induce or reward improper conduct. It can involve government officials, commercial entities including joint ventures or individuals and can be direct or indirect through third parties like agents or brokers.

The Company does not tolerate any form of bribery or corruption. Employees must not offer, pay, seek or accept a personal payment, gift or favour in return for favourable treatment or to gain any business advantage. Employees must follow the anti-bribery and corruption laws to which they and The Company are subject, remembering that UK and US anti-bribery and corruption laws are 'long-arm' laws that apply worldwide.

A facilitation payment is usually a small unofficial payment or gift, often in cash, demanded by providers of services to secure or 'facilitate' services to which the payer is already entitled. They can also be inducements offered by business people to customs, immigration or other officials to speed up the granting of services and permits. Typically, the action or process in question is one which the Public Official is already under a duty to perform and to which the payer has a legal or other entitlement.

Even where facilitation payments are customary business practice in a particular country, they are usually illegal under local law and may result in prosecution. Facilitation payments are treated as bribes and are criminal under UK law.

If any payment is requested, which is not for a legitimate service or goods and the amount is inappropriate, unjustifiable or disproportionate, it is likely to be considered a facilitation payment, and employees must not make the payment. In this event, or if employees have any suspicions or concerns whether a payment is permissible, they must consult their line manager as soon as possible.

The Company does not make donations to political parties or their representatives in any of the countries in which it operates.

The offering or making of charitable donations may amount to bribery when they are made with the



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intention of influencing business or official decisions or gaining a commercial or other advantage. This may be, for example, where a donation is made to a “charity” which is controlled by a Public Official who is in a position to make decisions affecting the Company.

Any charitable donation offered or made on behalf of the Group or using the Group’s financial resources must be legal under applicable local law and not made with the intention of influencing business or official decisions or gaining a commercial or other advantage

If employees are in any doubt in respect of any proposed charitable donation, they should consult the MD as soon as possible.

All gifts and hospitality given or received by employees on behalf of the Company must be recorded and submitted to the Compliance Manager.

Employees must not offer, promise, authorise or provide any money or item of value to any Public Official for the purpose of influencing them in the performance of their official functions with the intention of obtaining or retaining business or an advantage in the conduct of business for the Company, for the employee, their family, friends, associates or acquaintances or any other person. This is irrespective of whether the Public Official actually performs the function illegally, unethically, in bad faith, not impartially, or in breach of a position of trust.

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Managing Director



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Cyber Security Policy

It is the Policy of the Company:

- To protect the Information identified as vulnerable to Cyber-attack from a loss of: Confidentiality, Integrity and Availability.
- To comply with cyber regulatory and legislative requirements.
- To prepare Cyber Security Contingency measures for possible security incident in emergencies.
- Actively promote security awareness amongst all company & shipboard personnel.
- To identify and investigate the breaches of cyber security onboard ships.
- To develop Guidance and procedures to support incident handling, information backup, system access, virus controls, passwords and encryption.
- To define the role and responsibility of the Designated Cyber Security Incharge who shall manage cyber security onboard company's fleet and to assist CSO in implementation of the Cyber Security Policy.
- Company Security Officer is directly responsible for implementing the Cyber Security Policy within the company's fleet.
- It is the responsibility of each employee/crew member to adhere to the Cyber Security Policy of the Company.

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Managing Director



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Harassment and Bullying

The Company is committed to a workplace free from harassment, bullying and victimisation for all ship and shore staff. Everyone has the right to work with dignity, respect and without fear. Harassment and bullying damage wellbeing, teamwork and safety, and will not be tolerated in any form.

Harassment means unwanted behaviour that offends, humiliates or undermines a person. Sexual harassment means unwelcome conduct of a sexual nature. Bullying means repeated or serious behaviour that intimidates, degrades or threatens a person, including misuse of authority. Victimisation means negative treatment of anyone who raises or supports a concern. Such behaviour may be verbal, physical, written, visual or online, and a single serious incident may breach this policy.

All personnel must behave professionally and treat others with respect at all times. This policy applies onboard, ashore, during travel, in accommodation and in all work-related communication. Management must lead by example, communicate expectations clearly and act immediately on any concern. The Company will not permit retaliation against anyone who reports in good faith.

Anyone who experiences or observes harassment or bullying should report it promptly. Concerns may be raised with the Master, a senior officer, a supervisor, Human Resources, the Designated Person Ashore or through confidential reporting channels. Reports may be verbal, written or anonymous. The Company will protect confidentiality as far as possible and will handle all concerns seriously and fairly.

The Company will investigate cases impartially and without delay. Both complainant and respondent will be heard and treated with respect. Temporary protective measures may be used where needed. Findings will be recorded and outcomes communicated as appropriate. Where misconduct is confirmed, corrective and disciplinary action will be taken, which may include warning, training, reassignment, removal from duty or dismissal. False or malicious complaints may result in disciplinary action, but no action will be taken when a concern is raised in good faith.

The Company will provide periodic training on respectful behaviour and expected standards. Managers and Masters will receive additional guidance on handling concerns and maintaining a positive culture. This policy will be monitored and reviewed to ensure continued effectiveness.

Every individual is responsible for upholding this policy. Speaking up early, supporting colleagues and acting respectfully help maintain a safe and professional environment for all personnel at sea and ashore.

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Managing Director