

M/MARITIME

QUALITY POLICY

The Company is committed to providing a Quality service, which consistently & continuously meets the requirements of its customers whilst protecting assets under its care, its employees and the environment in general.

This is achieved by establishing & discharging managerial & operational processes, which have emerged from the combination of sound managerial principles and established experience in the Shipping Industry.

The Company aims to remain a quality service provider by:

- Meeting customer requirements as defined in the relevant Ship Management Agreements and Charter Parties,
- Developing and implementing controlled processes,
- Continual improvements in operational responsiveness,
- Complying with the requirements of ISO 9001, ISO 14001, ISO 50001 and ISM Code as well as continually improving its Management System,
- Establishing and communicating measurable & consistent objectives and performance targets to Company employees,
- Complying with applicable statutory requirements, international legislation and classification society requirements related to the services provided
- Operating vessels without accident(s) or incident(s) that could endanger Company's employees, the environment or assets under the company's care,
- Complying with current Health & Safety legislation and,
- Developing employee skills and increasing their contribution through effective training

In order to meet the above objectives, the Company has developed and implements a Management System, which as a minimum shall meet the requirements of ISO 9001, ISO 14001, ISO50001, OHSAS 18001, IMO ISM Code and the MLC 2006.

All Company employees are responsible for implementing the Company's Quality Policy.

The Company's management is responsible for monitoring and reviewing the Quality Policy at regular intervals in order to ensure that it remains relevant and effective.



SAFETY, HEALTH, ENVIRONMENTAL PROTECTION & ENERGY POLICY

It is the Company's Policy to promote and enhance:

- Health and Safety at Sea,
- Prevention of Human Injury or loss of life and welfare of employees,
- avoidance of any adverse impact on the environment (marine or otherwise), including property.

The Company's objectives regarding Health and Safety Management are:

- To provide for Safe Practices in ship Operation and a safe working environment.
- To prevent damage to the ship, her cargo and the environment.
- To assess all identified risks to its ships, personnel and the environment and establish appropriate safeguards.
- To prevent loss of human life and personal injury as well as ill health.
- To ensure that seafarers' work environment on board ships promotes occupational safety and health
- To continuously improve Safety Management skills of personnel ashore and aboard ships, including preparing for emergencies related to Safety, Health & Environmental Protection.
- To ensure that seafarers' work environment on board ships promotes occupational safety and health.

In order to effectively implement its Safety, Health, Environmental Protection & Energy Policy, the Company:

- Has appointed dedicated personnel with the responsibility to maintain an overview of Health, Safety, Environmental and Energy efficiency matters.
- Consistently follows all national and international rules and regulations governing the Marine Industry.
- Takes into account applicable guidelines, standards, codes and publications, which are issued by maritime organisations and are directed towards creating a safe, healthy and pollution free environment.
- Implements a Shipboard Occupational Health and Safety Program (SOHSP).
- Continuously monitors all safety, pollution prevention and occupational health aspects of the vessels.
- Complies with applicable legal and other requirements to which the Company subscribes which relate to its Occupational Health, Safety hazards and environmental aspects.
- Frequently inspects the managed fleet and carries out necessary maintenance and repairs
- Continuously improves its management system by taking corrective & preventive action for identified problem areas.
- Provides adequate information and resources to effectively implement this management system and achieve objectives and targets.
- Provides a framework for setting & reviewing OH&S, environmental & other objectives and targets.

- Has developed and implements a management system which is "*Safety, Health & Pollution Prevention and Energy Efficiency*" oriented.
- Has carried out a generic Risk Assessment to its basic operations and practices and has established safeguards against identified risks
- Endeavours to operate managed ships within ALARP ("*as low as reasonably practicable*") levels of risk.
- Has established measurable safety management system objectives that are evaluated and reviewed during Management Review Meetings. For the measurement & evaluation of the set objectives a number of targets are used.
- Undertakes an obligation to society (corporate social responsibility), in the form of commitment to local, national and international regulations, attention to environmental issues and adoption of a risk management policy.
- Makes every effort to provide a safe and healthy workplace and considers working safely a condition of employment.
- Provides necessary resources to implement the occupational health and safety program.
- Recognises that no task is so important for an employee to put himself at risk of injury or illness in order to get it done.
- Protects the Health of seafarers and provides prompt access to Medical Care on board and ashore when needed.
- Supports the purchase of energy efficient products and services, and where applicable supports design energy efficiency improvements.

All Company employees, shore based and seafarers are responsible for implementing the Company's Safety, Health, Environmental & Energy Policy and are required to comply with the applicable standards and with the ship's occupational safety and health policy and program.

The Company's Management is responsible for monitoring and reviewing the Safety, Health, Environment & Energy Policy and the company's occupational health and safety program at regular intervals in order to ensure that it remains relevant and effective.

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DRUG AND ALCOHOL CONTROL

It is the Company's Policy that no seafarer employed shall navigate the vessel, operate machinery or carry out his duties whilst he is impaired by drugs or alcohol or suspected to be under the impairment of alcohol or drugs.

The Company has defined as alcohol impairment a blood alcohol level of 0.04% (BAL) or 0.18 mg/l in the breath or greater.

In the interest of safety on board and at sea and for the benefit of the health and welfare of all crew members, the following rules shall be complied with rigidly.

1. The Company runs controlled alcohol vessel operations.
2. The possession or use of illegal or unprescribed drugs is strictly forbidden, as is the improper use of prescribed drugs.
3. The crew member is not permitted to bring or to keep on board, in his cabin or elsewhere, private supplies of alcohol.
4. Only the Master has the authority to issue a limited weekly allowance of soft drink or beer to be supplied three times per week. Only ordinary strength (maximum 5% ABV) beer of 330 ml container is allowed.
5. Only the Master has the authority for the distribution of the soft drinks/ beers. Supply and consumption of such alcohol shall be restricted to the dining room and shall be served in opened bottles. Under no circumstances, either on board or ashore, shall any crew member consume alcohol whilst on duty or within 4 hours prior to a scheduled period of duty. Whilst on shore leave, alcohol should never be consumed in such quantity as to impair the crew member's ability to properly perform scheduled duties.
6. Crewmembers who do not consume the beverages or the beers are not allowed to offer them to other seafarers.
7. No other alcoholic beverage is allowed on board the vessel, whatever the purpose, including for gratuity or gift purposes.

Seafarers found to be in violation of this Policy shall be immediately released from duty and dismissal /disciplinary action will be taken, including withholding of replacement costs. Refusal to be subjected to D&A testing would equal to admission of guilt and the person will be subject to the same repercussions as any offender.

Adherence to this Policy is considered as a term of employment.

SECURITY POLICY

It is the Company's Policy to establish and implement a "Security Management System" in order to meet the following security requirements:

- a) To develop, implement and maintain a Ship Security Plan for each vessel in accordance with the requirements of the ISPS code Part A & Part B and the U.S. Coast Guard NVIC 10-02.
- b) To detect security threats and take preventive measures against potential security incidents.
- c) To designate appropriate senior staff with overall responsibility for security within the company and individual ships.
- d) To cooperate with the responsible authorities and to act on advice from them.
- e) To promote security awareness amongst all employees.
- f) To establish a reporting & recording system for incidents.
- g) To establish, implement and verify specific security measures on board.

The Company is committed in providing the appropriate security guidance, advice, documentation and necessary resources in order to meet its security objectives and fully comply with the requirements of the ISPS code and any additional requirements that may be stipulated by the relevant competent Contracting Governments.

In particular, the Company is committed to ensure that the Company Security Officer, the Master and the Ship Security Officer are given the necessary support to fulfil their duties and responsibilities in accordance with chapter XI-2 and this part of the code. Furthermore, the Company shall consistently and systematically review its security policy and relevant security measures in order to ensure that they remain effective.