

# COMPANY'S POLICY STATEMENTS

## FLEET ANNOUNCEMENT

### 1. HUMAN RIGHTS AND HUMAN RESOURCE POLICY

In Zeaborn Ship Management we want to conduct our business and interact with the people around us in full support of the International Bill of Human Rights as much as we, as a company, can. We support the UN Sustainable Development Goals as much as our role as third-party ship managers allows and we are active participants in the United Nations Global Compact.

Everyone who works with us, ashore and on board, whether they are employed by or associated with Zeaborn Ship Management or whether we interact with them in our business of man-

aging ships shall be treated with respect. We do not tolerate any kind of discrimination and/or harassment based on race, ethnic background, gender, religion, disability, age or sexual orientation.

We are all hired to do our job to the best of our abilities and the overriding principle of the way we carried out our tasks is that we shall all be able to go home safely.

### 2. QUALITY POLICY

At the basis of any Quality Assurance system there is the need for continuous improvement. We are on the road to continuously improve the quality of our services, control our unit costs of management and have and keep satisfied customers. We firmly believe that Environmental, Social and Governance principles are the right way to drive the shipping industry towards many goals that society, of which the stakeholders in our company and in our clients' organizations are part, demands now and in future.

We will keep and maintain our minimum standards of maintaining the ships under our management and we shall never knowingly compromise the safety of our people, the ship, the cargo and the environment. We shall follow national and international laws as applicable and we shall comply to the utmost of our abilities with rules and regulations which govern our industry.

We commit to being transparent to our own people and to our clients, we are active members of the Maritime Anti-Corruption Network and the

Managing Board commits without reservation to being open for any reports, including anonymous whistleblower reports, of violation of our policy of human respect and compliance with laws and regulations.

It is also the duty and responsibility of everyone in Zeaborn Ship Management to suggest areas of improvement in the way we, as a company, as one team, improve quality of service, control costs and keep our clients satisfied.

### 3. HEALTH, SAFETY AND ENVIRONMENTAL PROTECTION POLICY

We shall all be constantly aware that we face risks in the conduct of our business. We cannot eliminate all risk, but we do our best to have the tools, skills and knowledge to bring risks down to manageable levels and to mitigate possible consequences of our actions.

We do not violate MARPOL and other environmental Rules and Regulations. Through application of Maritime Resource Management principles, we try our best to use all skills and knowledge reasonably available to us on board and ashore and to challenge unsafe acts before they become incidents or accidents. Like every quality management system or Safety Management System is a work in progress – constantly developing as circumstances change and new tools and knowledge become available. Regular review of our Safety Management System is a commitment for everyone in our company.

One of the measures of managing risk is that we employ competent people, but we realize that even certificated, skilled and competent people need training to be able to confidently and safely handle the situations they may face in their daily work. No quality management system can describe all possible situations we may face, so we need to encourage our people to be trained and to use all available skills in their teams to handle new situations – always with the ultimate aim that everyone will be able to go home safely.

The single most important empowerment of everyone in Zeaborn Ship Management is to STOP WORK when the safety of people, the ship, the cargo or the environment is potentially in danger and – changed- circumstances make a re-assessment of the situation necessary.

### 4. ENERGY EFFICIENCY POLICY

Environment, Social and Governance principles will drive the changes in our industry much more than international regulations will. While complying with regulatory requirements is a key prerequisite of our business activities, Zeaborn Ship Management takes a leading role in the development of comprehensive efficiency optimization strategies. As a partner to the shipping industry,

we offer innovative efficiency-enhancing and optimizing solutions that represent cutting-edge technology in this market. We are willfully and knowingly taking our share in making sustainable use of energy and by this support the global efforts of reducing Green House Gases.

### 5. DRUG AND ALCOHOL POLICY

Everyone in our shore employment and everyone who is employed on ships operated under our Documents of Compliance must perform their duties in sober conditions. The use of drugs is strictly prohibited and not tolerated. Being under the influence of recreational drugs while on the way to or from a Zeaborn Ship Management ship or while on board is reason for instant dismissal.

will be subject to disciplinary measures including immediate dismissal.

The company also supports measures and actions of Authorities in relation to criminal offences in relation with the Drug and Alcohol Policy.

A ZERO ALCOHOL policy applies to all ships, meaning the consumption of alcohol is prohibited for all seafarers during the complete duration of the employment period and for any other company staff while on board. This rule shall not be deviated from. Anyone in breach of this policy

**6. ANTI-CORRUPTION & BRIBERY**

Zeaborn Ship Management is an active member of the Maritime Anti-Corruption Network, seeking to eliminate endemic corruption in the shipping industry through engagement in collective action strategy developments and reporting of attempts to solicit bribery or facilitation payments from the ships' crews. The company follows a strict ZERO BRIBERY policy and strives for ultimate ELIMINATION OF FACILITATION

PAYMENT without ever endangering the Captain, the crew, the ship, the cargo or the environment.

We have procedures in place addressing the handling of such bribery or facilitation payment requests or other forms of corruption. Everyone in Zeaborn Ship Management is required to comply with this policy, ashore as well as on board.

**7. INFORMATION SECURITY POLICY**

Zeaborn Ship Management's Information Security Management System, through continuous updating in accordance with current Laws and Regulations and developments in the Information Technology industry, aims to protect the information assets of our company as well as information assets entrusted to us by our clients. We

have made a start with ISO 27001 'IT Security' certification and we are committed to develop the scope of this information security approach in our company and with our clients.

**Michael Brandhoff**  
CEO

**Michael Duque**  
Senior Vice President MALP