

COMPANY'S POLICY STATEMENTS

FLEET ANNOUNCEMENT

Our company policy statements are designed to support our commitment as an active participant to the UN Global Compact and supporter of the UN Sustainable Development Goals. We believe that these outlined policies are essential for a third-party ship manager to uphold our values and achieve our Environment, Social and Governance (ESG) ambitions. By adhering to these policies, we aim to make a positive impact on our value chain and the communities in which we operate.

1. HUMAN RIGHTS AND HUMAN RESOURCE POLICY

In ZEABORN Ship Management (ZSM) we conduct our business and interact with the people around us in full support of the International Bill of Human Rights.

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 managing ships, is 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 do our job to the best of our abilities and the overriding principle of the way we carry out our tasks is that all our people shall be able to go home safely.

Through our Code of Conduct (CoC) and Code of Conduct for Suppliers (CoCS), we define and communicate the way we conduct our business, along with our internal or external stakeholders and the value chain we operate

2. QUALITY POLICY

The basis of any Quality Assurance system is the need for continuous improvement. We 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 keep and maintain our standards of maintaining the ships under our management and we never compromise the safety of our people, the ship, the cargo, and the environment. We follow national and international laws as applicable, and we comply to the utmost of our abilities with the 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 (MACN), 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 for 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**

ZEABORN's leadership team (CEO, MDs, SVPs, VPs) has the overall responsibility for health, safety, security and environmental protection across all business's activities of the group, both on board and ashore. This is achieved through various means, which include the investigation and learnings from incidents, safety programmes and the implementation of a just culture (ref policy). This means, we are constantly aware that we face risks in the conduct of our business. We do our best to have the tools, skills, and knowledge to reduce risks and to mitigate possible consequences.

We do not violate MARPOL and other environmental Rules and Regulations. Through application of Global Resource Management (GRM) principles, we 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 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.

We employ skilled and competent people, motivate and train them to be able to confidently and safely handle the situations they face in their daily work. We also encourage our people to be trained and to use all available skills in their teams to handle new situations – always with the aim that everyone will be able to go home safely. The 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 reassessment of the situation necessary.

**4. ENERGY EFFICIENCY
POLICY**

Environmental principles and innovation drive the decarbonization pathway to substantial changes in our industry, as well as international regulations will. In ZEABORN Ship Management, we make the commitment to establish a baseline of efficient operation of the ships and their equipment and in cooperation with our clients we improve the efficiency of performance of

the ships in accordance with regulatory frameworks, as these will be developed, accepted, and demanded by society over time.

Training, new skill sets and increasing awareness of everyone in our company to improve sustainable performance of our managed fleet is our commitment.

**5. DRUG AND ALCOHOL
POLICY**

Everyone in our shore employment and everyone who is employed on ships operated under our Documents of Compliance perform their duties in sober conditions. The use of drugs is strictly prohibited and not tolerated.

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 whilst on board. This rule shall not be deviated from. Anyone in breach of this policy is subject to disciplinary measures including immediate dismissal.

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

6. ANTI-CORRUPTION & BRIBERY

ZEABORN Ship Management is an active member of the Maritime Anti-Corruption Network (MACN), 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 FACIL-

ITATION 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

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

Dr. Michael Silies
Managing Director