



PCASP INDUCTION AND DEPLOYMENT

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INTRODUCTION

Seagull Maritime wish to ensure a consistent and structured approach for the deployment of Privately Contracted Armed Security Personnel (PCASP) on board commercial vessels.

This procedure outlines the steps taken to ensure all PCASP are suitably trained, screened and prepared for deployment.

SCOPE

All prospective operatives ahead of first operational deployment and existing operatives ahead of re-deployment supplied by Seagull Maritime or a 3rd party manning agency.

RESPONSIBILITIES

Departments, staff, personnel and suppliers have designated specific responsibilities as stated within the Procedure.

INDUCTION

Induction Training - MSO & Team Leader

All PCASP will have undergone Maritime Security Operative training with the 3rd party provider prior to being made available for deployment.

All PCASP are required to do basic Induction Training conducted by Seagull Maritime training staff either via remote video training or in-person at the company offices in Dubai.

Induction Training is carried out by qualified and experienced personnel approved by Seagull Maritime. The Human Resources & Training Department will maintain a training record of all induction training.

Induction Training Syllabus

All operatives are to undergo instruction and training in the following:

- Company History & Familiarisation
- Management Structure and Chain of Command
- Quality Management System
- Security & Security Operations Management System
- Company Policies and Procedures and Objectives
- Training Requirement and Training Record
- Security Screening Requirements and Probationary Period
- Information Technology Security
- Seagull Maritime Standard Operating Procedures
- Seagull Maritime Rules for the Use of Force and Escalation of Force
- International Code of Conduct & Human Rights Awareness
- Threat and Intelligence Analysis
- Best Management Practice - Maritime Security
- Maritime Environment (including ship type, navigation, communications, radar)

All Operatives on completion of the training will be issued with a certificate of completion by Seagull Maritime.

As part of the induction process, all operatives must register on the company's online training platform and complete the Management System Awareness training module prior to deployment.

NOTE: MSO's and Team Leaders who have completed the City & Guilds Approved Maritime Security Operative Qualification will be exempt from topics already covered.

Induction Training - Team Leader Only

Seagull Maritime select and approve their Team Leaders based on their experience in theatre, qualifications and ability to lead.

In addition, they are to receive instruction and training in:

- Implementation of Standard Operating Procedures
- Briefing Operatives on the Rules on the Use of Force
- Briefing Operatives on the International Code of Conduct for Security Providers
- Briefing Operatives on their roles and responsibilities
- The completion of Team Member Appraisals
- Completion of reports

The Human Resources & Training Department will maintain a training record of induction.

All TL's on completion of the training will be issued with a certificate of completion.

Refresher Training

All operatives are required to re-attend a refresher training course when deemed appropriate and logistically possible or when directed to by the HR & Training Department.

Additional training should be provided by the TL for MSOs where the TL has identified areas of weakness during transit or where the MSO has not deployed within the last 6 months.

Refresher training modules, updated documents training, and health and safety training are delivered via the company's online training platform. Completion is tracked automatically and certificates of completion are issued upon passing the required assessments. Operatives may complete refresher modules remotely between deployments.

Ongoing Deployments

As we utilize 3rd party providers for operatives, operatives may be utilized by other PMSC's in between deployments.

Human Resources & Training will ensure:

- That the allocated manpower has completed the Seagull Maritime induction training within the last 12 months
- That any significant change to operating procedures, policy or procedure including RUF, will be communicated and delivered to existing operatives

Changes to operating procedures, policies, or rules on the use of force are communicated to operatives via the company's online training platform. Operatives returning from extended absence or deployment with other PMSCs are required to complete any outstanding training modules on the platform before redeployment. The GCD and HR & Training Department will monitor platform completion records to confirm training currency.

Where the trainer is unhappy with the performance of a TL or MSO in the training, he can advise Operations appropriately.

Once an operative has been handed over to OPS following Induction Training, the P File AND 1Clearview Profile of the operative must be reviewed to ensure they are complete.

Ongoing review of all personnel documentation is to be conducted by the Operations Department.

On return from deployment, Human Resources & Training will review the P File and the 1Clearview profile and advise the Operative and their manning agency of any outstanding documentation.

On receipt of updated certification/documentation from an operative or manning agency, the Human Resources & Training Department will update the P File and 1Clearview profile accordingly.

Operatives are not to be deployed with outstanding training or certification requirements without senior management sign-off.

Where new or additional training requirements have been identified, the Human Resources & Training Department will liaise with the relevant training provider and the Operations Department to arrange the training.

PROMOTION

Seagull Maritime may look to its existing pool of Maritime Security Operatives with a view to promotion to Team Leader. The following criteria will be taken into consideration:

- Team Member Appraisals
- Interaction with Operations
- Vessel Feedback Questionnaires
- Experience with Seagull - minimum of 6 transits or 60 Sea Days
- Operatives desire to be Team Leader

Management may, at their discretion, select for promotion those MSOs who do not meet the specific criteria identified in this section.

DOCUMENTATION

Operatives are not to deploy without having completed the following documentation:

- Employment Contract with Seagull Maritime
- PCASP RUF Signature of Understanding
- NOK Form
- Record of completion of Induction Training Course

REVIEW

This procedure shall be reviewed at the frequency defined in the Document Register (SM/INT/REG/001), or earlier if a significant change occurs that affects PCASP induction, training, or deployment practices within Seagull Maritime.