



FIREARMS COMPETENCY

| | |
|----------------------------|--|
| Document Title | Firearms Competency |
| Document Ref | SM/INT/PRO/009 |
| ISO Standard | ISO 9001:2015 / ISO 18788:2015 / ISO 28007:2015 / ISO 28000:2022 / ISO 45001:2018 |
| Version | 1.0 |
| Classification | Internal |
| Effective Date | 2 April 2026 |
| Review Frequency | As per Document Register defined review date, or upon significant change |
| Owner | Group Compliance Director |
| Approved By | Pavel Shparber, CEO / Darren Watts, Group Compliance Director |
| Applicable Entities | Seagull Maritime FCZO, Seagull Maritime Malta, Seagull Maritime Nigeria, Seagull Maritime UK, Seagull Offshore |

INTRODUCTION

All personnel who may work in security operations for Seagull Maritime may be required to use or carry firearms during the course of security operations.

This procedure specifies the minimum requirements for operatives to be deemed competent to use or carry firearms on behalf of Seagull Maritime and applies in conjunction with SM/OPS/PRO/001 – Rules on the Use of Force.

SCOPE

All personnel and prospective PCASP seeking employment/deployment as:

An operative with the intention of providing privately contracted armed security services on behalf of Seagull Maritime.

An operative on any security operation requiring the carriage or potential use of a firearm.

RESPONSIBILITIES

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

REQUIREMENTS

All Seagull Maritime contracted Security Operatives are to be competent and safe in the handling, use and maintenance of all weapon systems that are intended to be used on a maritime security operation.

All operatives will have successfully completed a Firearms Competency Certification and Weapon Systems Management Course on a weapon system(s) that they intend to deploy with.

This course should consist of dry and live tests to ensure all operatives are competent in:

Weapon Handling Drills and Weapon Familiarization

Application of Fire on a full bore 7.62mm Weapon System

Application of Fire on a full bore 5.56mm Weapon System

ANNUAL CERTIFICATION

All Seagull Maritime contracted maritime security operatives are required to undergo Firearms Competency Training which covers the following:

- a) Principles of marksmanship
- b) Weapon handling test
- c) Grouping and zeroing and multiple firing positions
- d) Practical Multiple Target Acquisition
- e) Live fire practice
- f) Documented and certificated confirmation throughout

As a minimum, training is conducted on the following weapon systems:

- a) FN L1A1 SLR (7.62mm) or variant
- b) H & K G3 (7.62mm) or variant
- c) M4 or variant (5.56mm) or variant
- d) AK47 or variant

In addition, all operatives' complete induction and deployment training which covers:

Rules on the Use of Force

International Code of Conduct & Human Rights Awareness

Weapon Safety and Storage on board vessels and in port

Certification Validity

Any personnel wishing to maintain deployment availability are required to re-validate every 12 months on a Firearms Competency Certification Course. The GCD is responsible for ensuring that all firearms competency certifications are current and valid before approving deployment.

Between annual certifications, operatives are required to complete weapons safety refresher modules via the company's online training platform. Completion records are monitored by the GCD and HR & Training Department to confirm ongoing competency currency.