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# **INCIDENT & CRISIS MANAGEMENT PLAN**

# Incident and Crisis Management



## INTRODUCTION

The purpose of the Incident and Crisis Management Plan, referred throughout as the IMP, is to describe the management organisation and to layout the procedures required to deal with an incident or crisis arising within Seagull Maritime.

## SCOPE

Covers all activities and operations under the control of Seagull Maritime as identified in the scope of our management systems.

This plan will work in conjunction with any relevant client's Incident and Emergency Response Plan. In certain circumstances, where detailed, the client's Incident and Emergency Response Plan will take primacy.

This is a live document and will be amended and expanded as is necessary to reflect the change in the number of personnel and the nature of operations as we develop and expand.

This plan describes the procedures to be taken in the event of any incident or emergency in our operational or geographical locations.

We believe in prevention first and foremost through the application of best practices and risk management commitment.

However, in the event of any potential incident or unforeseen natural disaster or manmade incident that results in an event that may potentially or seriously threaten the immediate and future safety and health of people, the environment, property or business, this plan will be implemented.

## RESPONSIBILITIES

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

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## DEFINITIONS

**Crisis:** An event that seriously threatens the immediate and future safety and health of people, the environment, property or business.

**Incident:** A situation that has the potential to escalate into an emergency should preparatory systems fail to respond adequately.

**Incident Response Team (IRT):** Refers to the team or person dealing with the specific incident at the occurrence of the incident or crisis

**Client:** Whom so ever Seagull Maritime may be in the process of delivering service or product to at the time of a potential incident or crisis or whose personnel or operations may be affected.

**Impact:** Impact is defined by how many personnel or functions are affected. Seagull Maritime have identified 3 levels of impact:

**1 (Low): One or two individuals are affected. Operational capability and service delivery is not affected. Infrastructure and work environment is not disturbed.**

**2 (Medium): Multiple individuals or departments are affected. Operational capability and service delivery has been disturbed and operations are affected. Infrastructure and work environment is disturbed.**

**3 (High): All personnel are affected. Operational capability and service delivery has been halted or will require to be halted. Infrastructure and work environment may not be available. This would also be considered a "crisis."**

The impact level of an incident will be used in determining the priority for resolution and action.

**Priority:** Priority is determined by utilising a combination of the incidents impact and severity.

**Risk:** Risk is the probability or threat of damage, injury, liability, loss, or any other negative occurrence caused by internal or external vulnerabilities.

Seagull Maritime has a structured approach to risk management that contains relevant risk assessments and documented controls.

**Threat:** An event or thing likely to cause damage or danger to the business, supply chain or personnel

**Controls:** Actions and procedures that are put in place by Seagull Maritime to reduce threat or risk and prevent incident escalation

**Severity:** Severity is determined by how much Seagull Maritime are affected operationally and commercially. There are 3 grades of severity:

**1 (Low): Incident reduces Seagull Maritime capability but does not affect overall operational capability and service delivery.**

**2 (Medium): Incident is preventing Seagull Maritime from providing part of its operational capability and service delivery in a time sensitive manner.**

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**3 (High): Incident/Crisis is preventing Seagull Maritime from providing all or a large majority of operational capability or service delivery.**

## **PRIMACY**

In the majority of incident or crisis situations at Seagull Maritime locations or where Seagull Maritime are operational, Seagull Maritime will take primacy in dealing with any incident and will manage and coordinate any emergency response through to its conclusion as laid out in this document.

However, there may be occasions, due to but not limited to, the nature, location, type, scale or seriousness of the incident that the client or Seagull Maritime may deem that in the interest of all involved that the client takes primacy in responding to the incident. If this is the case, then the client will take over primacy and manage and coordinate any response through to its conclusion in accordance with their own Incident Management Plan.

**IMPORTANT NOTE: Similarly, a client affected by a crisis may require Seagull Maritime support and raise an incident with Seagull Maritime. In such cases, this plan is followed accordingly and in liaison with the client.**

## INCIDENT PRIORITISATION AND ESCALATION

### Prioritization

It is essential to the successful implementation of this plan that staff quickly determine the nature of an incident and prioritise it accordingly. This allows us to:

- ✓ **Quickly identify operational and service capabilities impacted by the incident.**
- ✓ **Identify personnel responsible for the management of the incident.**
- ✓ **Recognise the potential for crisis and minimise the threat of escalation.**

The severity and potential impact of the incident should be established. All incidents are important but incidents that affect operational capability or service delivery on a large scale require addressing with greater urgency than those that are only affecting a minimal number of personnel.

Consider issues such as does the incident create a work stoppage that affects the client or personnel? Is there alternative means of the client's need being met or personnel continuing while the incident is unresolved?

Consider these possible scenarios:

#### Scenario 1

The payroll system has stopped working. The person processing payroll is directly affected by being prevented from carrying out their task. However, all personnel are affected. Dependent on the time this issue arises, 3 weeks before salaries are due to be paid or 1 day before would drastically affect the impact and priority of resolution.

#### Scenario 2

A team member has been involved in a slip, trip or fall. It is reported that despite some bruising he is reporting that he is well and ok to work. The incident is reported and managed however shortly after the team member is found unconscious and in severe ill health and requires an immediate emergency care, this has now escalated to a crisis incident as the impact is potentially the loss of life.

When identifying and prioritising incidents, Seagull Maritime staff are urged to think ahead and consider other possible consequences of the incident and how an escalation may arise.

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## PRIORITY DETERMINATION

The priority given to an incident that will determine how quickly it is scheduled for resolution will be set depending upon a combination of the incident severity and impact.

		SEVERITY			
		1 – LOW	2 – MEDIUM	3 – HIGH	
		Incident or Issue is preventing personnel from performing a part of their duties	Incident or Issue is preventing personnel from performing critical time or operationally sensitive functions	A major part of or all companies capability is unavailable	
IMPACT	1 - LOW	Degraded operational and service capability. Minimal personnel affected. No effect on clients.	1 LOW	1 LOW	2 MEDIUM
	2 - MEDIUM	Operational and service capabilities significantly reduced. Time-limited services are potentially affected. Clients and stakeholders are potentially affected. Multiple company divisions affected.	2 MEDIUM	2 MEDIUM	3 HIGH
	3 - HIGH	All personnel affected. Personnel from multiple agencies affected. Client and stakeholders are affected. Operational capability and service delivery unavailable Loss of life or potential for loss	1 HIGH	1 HIGH	1 HIGH

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## TARGET TIMES

Our objective is to always have some able to provide a response to incidents 24 hours a day, 7 per week, 365 days per year.

Targets for response are detailed below:

Priority	Targets				
	Initial Response Time	Resolution Minimal	Timeframe	Resolution Complete	Timeframe
1 – Low	24 hours	N/A	N/A	Restore full capability and close incident	24 hours
2 – Medium	4 hours	Reduce incident level to low	4-8 hours	Full capability restored and incident closed	24 hours
3 – High	1 hour	Reduce Incident Level to Medium/Low	ASAP	Full capability restored and incident closed	48 hours

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## ROLES AND RESPONSIBILITIES

All incidents will have an Incident Response Team (IRT), nominally the person who receives or is notified of the incident initially. As the Company operates a 24/7 duty Ops, the initial IRT will be:

During Office Hours: Operations Manager

Out of Hours: On Duty Operations Administrator reporting immediately to the Operations Manager and the Group Compliance Director.

Subject to the IRT's assessment of the incident and in line with this plan, upon notification of an incident and subject to its priority and impact, Seagull Maritime will form an Incident Response Team (IRT) that will form the core of any response. That response is in proportion to the priority of the incident.

Dependent on the level of priority, part or all the appointed IRT may be required. Regardless of the composition of the IRT, all incidents require the assignment of an Incident Response Manager (IRM).

Seagull Maritime will select staff for the full composition of the IRT. Our IRT composition considers dual functionalities, with each member of the Team able to cover for a potentially absent team member.

For all crisis incidents (Priority 3), the Chief Executive Officer must be immediately informed. They will be responsible for designating the Incident Response Manager and specifying the composition of the IRT.

Where the Chief Executive Officer will be known to be unavailable, they are responsible for nominating the person responsible for assuming this responsibility. If this is unavailable, it will be, by default the Group Compliance Director. For Priority 1 and 2 incidents, subject to the level of escalation needed, the Chief Executive Officer can be informed at the earliest opportunity or the start of the next working day.

# Incident and Crisis Management



## RESPONSE TEAM DESIGNATIONS

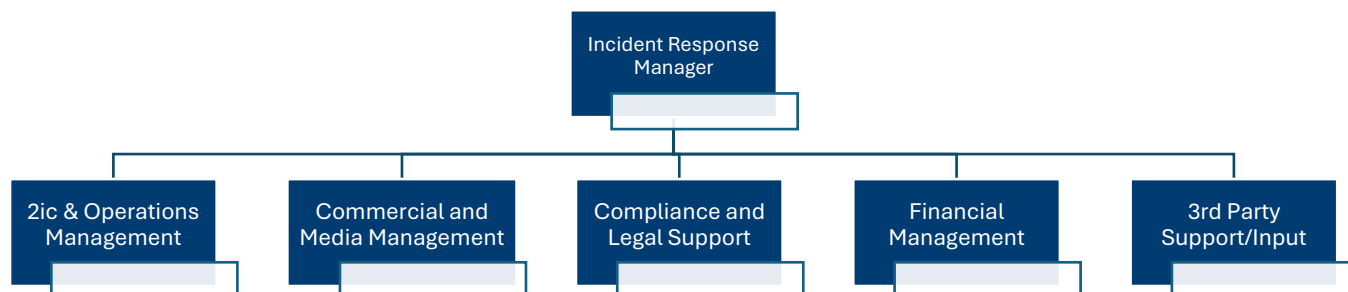
As personnel available to be deployed in an IRT will vary and also be contextual dependent on the incident/crisis type, this IMP designates specific duties against the role potentially designated in the IRT and the preferred staff role for the designation.

Designation	Staff Role	Responsibilities
Incident Response Manager	CEO/Director Compliance	<ul style="list-style-type: none"> <li>✓ Mobilise and Lead CRT</li> <li>✓ Initial Evaluation/Risk Analysis</li> <li>✓ Authorise any location moves</li> <li>✓ Authorise emergency purchases</li> </ul>
2IC & Ops Management	Operations Manager	<ul style="list-style-type: none"> <li>✓ Follow SOP's</li> <li>✓ Act to contain incident</li> <li>✓ On-site management of resources</li> <li>✓ Manage move to new location if necessary</li> </ul>
Commercial and Media Management	CCO/Designated Commercial Manager	<ul style="list-style-type: none"> <li>✓ Manage interactions with clients where affected</li> <li>✓ Manage social media communications and liaise as required with media agency re external communications</li> </ul>
Compliance and Legal Support	Director Compliance/In House Attorney	<ul style="list-style-type: none"> <li>✓ Communicate with authorities and key stakeholders</li> <li>✓ Authorise or review any potential compliance related decisions</li> </ul>
Financial Management	CFO/Finance Manager	<ul style="list-style-type: none"> <li>✓ Facilitate prompt payments for any services or authorised procurement</li> </ul>
3 <sup>rd</sup> Party Support/Input	N/A (External Media Agency, Law Firm etc)	<ul style="list-style-type: none"> <li>✓ As required based on their expertise</li> </ul>
On Scene Commander	Team Leader/Vessel Manager (3 <sup>rd</sup> Party)	<ul style="list-style-type: none"> <li>✓ Liaise with IRM</li> <li>✓ Provide on scene updates</li> </ul>

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## PRIORITY 3 INCIDENT RESPONSE TEAM



In a Priority 3 incident, typically a crisis the full IRT would be convened to manage and respond to the incident.

3<sup>rd</sup> party support/input may be multiple entities such as insurers or client representatives.

## PRIORITY 2 INCIDENT RESPONSE TEAM

In a Priority 2 Incident, the full composition of the team will not be required, only those applicable to the incident but other experience or support may need to be called upon as the incident develops and the composition of the team should be amended accordingly.



In the example above, this IRT would be suited to an operational incident involving a client's vessel or asset.

Alternative compositions would be available dependent on the incident.

The IRM is responsible for the selection of his IRT in a Priority 2 Incident. The IRM should consider:

- ✓ Relevant Knowledge and skills applicable to the situation

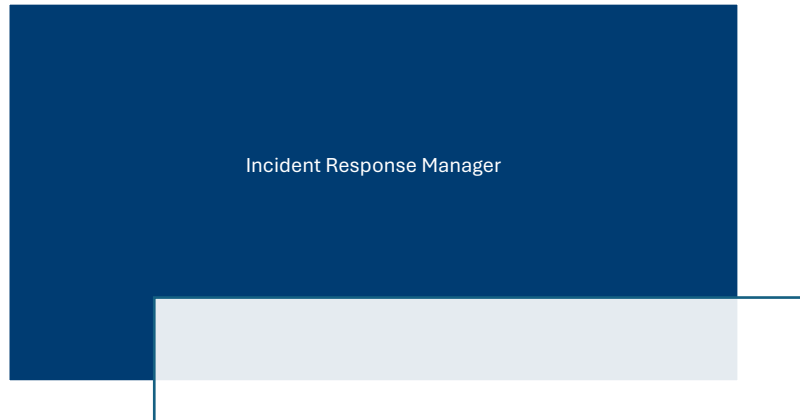
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- ✓ Availability at location

Where required, the IRM can select other members of staff or personnel to make up the composition of the IRT if there is a justifiable case to do so.

## PRIORITY 1 INCIDENT RESPONSE TEAM



In a Priority 1 Incident, the IRM may be able to function individually applicable to the relevant situation and utilising staff and other members of the IRT as required. IRM selection for a Priority 1 Incident is dictated by the type of incident and relevant personnel.

## NOTIFICATION AND ACTIVATION (COMMUNICATIONS AND COORDINATION)

### INITIAL RESPONSE

The key to minimizing the impact of an incident or crisis is the early detection and reporting of the incident.

Any incident or emergency will immediately be brought to the attention of the initial IRT as defined who will in turn notify the Operations Manager (who will become the interim IRM). This notification will include the general details of the situation, to include the five W's (Who, What, Where, When, Why).

Until the chosen IRM or if on board a vessel, his designated-On Scene Commander (OSC) can take control, the senior person present will take responsibility for the management of the incident or incident site.

If there is an injury, the recommendations of the senior or most experienced medical person present will be followed, unless the OSC deems that more individuals will be put at risk of death or injury.

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## CLIENT NOTIFICATION (IF REQUIRED)

Where the incident or crisis is on-board a client vessel being monitored or may affect such, Seagull Maritime are to ensure that the client is advised of the incident or emergency as soon as possible under the direction of the IRM. The IRM is to contact the client wherever possible.

Seagull Maritime should provide the client with the following information:

- ✓ Time and place of the incident
- ✓ Nature of incident
- ✓ Description of facilities involved
- ✓ Corrective action being taken
- ✓ Details of injuries and fatalities
- ✓ Contact details for update information
- ✓ Location and contact details of the Seagull Maritime IRM

The client will be advised to notify their Emergency Response Liaison Officer to contact the Seagull Maritime Incident Response Manager.

## FIRST RESPONSE

In all incidents or crisis, there is a requirement for an Incident Response Team (IRT). Primarily the person receiving the initial notification or becoming aware of a potential or developing incident or crisis.

Seagull Maritime have a 24/7 operational facility that is manned continually. All responses will originate from there. However, it is recognised that there may be occasion where an incident or crisis is reported to another member of Seagull Maritime staff. In such cases, the member of staff should advise the initial IRT immediately.

The IRT is required to be fully conversant with the Incident & Crisis Management Plan. The IRT is responsible for the appropriate application of the methodology to decide the Priority Level of any incident and to alert the appropriate IRM.

## MEDIA RESPONSE

It is to be anticipated that any incident or crisis of a significant level or priority will attract media attention.

The primary rule of Seagull Maritime in such cases is:

***No comment is to be made to the Media regarding the Incident or Crisis prior to the gathering of the IRT and the IRT making a considered judgement on any required statement.***

The IRT are prohibited from discussing any incident or crisis with anyone outside of the IRT or those directly involved in the incident. Where the IRT is contacted by media, a firm "No Comment" should be made politely and respectfully.

The designated Media and Commercial Officer or the Chief Executive Officer are the only approved persons to speak to the media at any time.

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Any response to an incident or crisis by the IRT will be non-judgemental, considered and brief and will not contain any substance of accusation or blame.

Seagull Maritime have a contracted media agency who will provide support and guidance on preparing and issuing statements and engaging in dialogue with the media.

Seagull Maritime have a contracted legal partner, who should always be consulted prior to the issuing of any type of statement or response.

Post incident, any further media contact by any member of staff without the direct approval of the CEO is prohibited.

## DOCUMENTATION AND REPORTING

All incidents should be reported using the Seagull Safety Reporting App ([report.seagullmaritimeltd.com](http://report.seagullmaritimeltd.com)) or the issued Seagull Maritime Incident Report Form. The form should be completed at the earliest opportunity following the incident; however, priority is given to incident resolution and completion of the form should not hinder any efforts to resolve the incident.

Any of the following are deemed to be 'Incidents' for the purposes of investigation and reporting and should be reported on the Incident Report Form:

1. Loss of, or damage to, or destruction of, client property
2. Piracy Incident
3. Injury or death of personnel
4. Suspected criminal incidents
5. Serious disciplinary incidents
6. Discharge of any weapon (including pyrotechnics), under ANY circumstance.
7. Loss of, or damage to, arms and ammunition
8. Loss of, or damage to, or destruction of, communications, IT and personal equipment
9. Security Incidents

## INVESTIGATIONS

Regardless of the nature of the incident or crisis, following resolution an investigation is required to identify:

- ✓ Reason for the incident or crisis
- ✓ Actions taken
- ✓ Mistakes made
- ✓ Improvement that can be made to the IMP or BCP based on the incident or crisis.

The Group Compliance Director will request the Incident Report Form and review the Incident Report Form at the request of the IRM.

An Incident Director (ID) will be appointed by the CEO to direct the investigation. The ID has the full authority of the CEO to investigate all matters on the company's behalf.

The purpose of any investigation is to gather all relevant information and convey that information in an impartial manner to Senior Management for their assessment.

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Upon completion, the ID must be confident that it has outlined the full scope of the matter, and that it has clearly presented all the facts. Witnesses must be instructed to stick to the facts; there must be no speculation or opinion. In particular, witnesses must not include a version of events as it has been relayed to them (hearsay evidence) if they did not directly witness the incident.

Every investigation must be conducted in accordance with the following guidance.

- a) Statements of Relevant Personnel. Every possible witness must be considered.
- b) Statements will be recorded by the ID. Witnesses will be warned that their statements will be recorded in writing and presented as part of an investigation.
- c) Where a witness is unable or unwilling to attend this must be recorded on the final report.
- d) Video Footage and Photographs. Video footage and photographs or the use of software or drawings to describe scenes provide excellent documentary evidence.
- e) Consideration must always be given where possible to visiting the scene of an incident and taking photographs that assist in the understanding of the incident.
- f) Photographs of any recovered evidence or of similar items to property that is lost or damaged should always be included. Photographs of client property following damage are mandatory. All photographs should be clearly marked explaining the place, date and time the photograph was taken and who took it.
- g) Video footage recovered from helmet cameras if used must be done so in a similar manner. A record of any visual evidence collected in this way must be accurately compiled by the ID and presented with the Incident Report.
- h) Recovery of Evidence. Where an object is recovered to form part of an inquiry it must be logged as an exhibit within the report. Exhibits must be retained for the duration of the inquiry and only released or disposed when the incident has been closed.
- i) Copies of Relevant SOP, Laws or Regulations. When a breach of an SOP, law or regulation is alleged the inquiry must contain a copy of the relevant SOP, law or regulation.
- j) Details of notifications made to international liaison, client, insurer and relevant authorities including those of the flag state should be retained.

The IRM is to complete the details of the incident and where required, assign it to the relevant departmental managers for investigation and corrective actions.

On completion of the investigation, the form should be returned, completed, to the Group Compliance Director who will raise non-conformance, corrective or preventive actions as required and in accordance with the Non-Conformance, OFI and Corrective Action Management procedure (SM/INT/PRO/001).

Incident investigations will be contextual and varied in the detailed requirements. While some immediate findings may be required to be disclosed as soon as possible, best efforts should be made to close any investigation within 30 days of the incident. Where further information is required or delays are expected, the ID will advise senior management accordingly.

Where client feedback is required, the IRM, or his appointed person, should advise the client of the details of the result of the investigation and where able, details of actions taken.

Any doubt as to what details can be provided to the client should be clarified with the IRM and the Group Compliance Director.

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## TRAINING AND DRILLS

The Incident & Crisis Management Plan is only as effective as the personnel using it. It is therefore a requirement of the Plan that regular training and drills are carried out to ensure the effectiveness of the Plan and the Business Continuity Plan. Testing keeps teams and employees effective in their duties, clarifies their roles and reveals weaknesses in the Business Continuity Plan.

The IRT are to be educated about their responsibilities and duties within this Plan and the Business Continuity Plan. The IRT is to be trained annually, and new members should be trained when they join. All staff should be trained in respect of the prevention of incidents as appropriate.

All personnel not assigned to the IRT have a requirement to be familiar with this Plan if they are required to assist the IRT or become aware of a potential or developing incident. They should also be briefed on the Business Continuity Plan where they are directly affected. All training should be recorded on individual staffs training records by the Group Compliance Director.

At least one tabletop exercise should be completed annually alongside learning analysis of any actual incidents.

## INFRASTRUCTURE & REDUNDANCY

In the event of an incident or crisis that involves damage or the withdrawal of critical infrastructure such as internet or office facilities, Seagull Maritime has a business continuity plan in place that should be referred to that provides information on:

- ✓ Alternative operations email address
- ✓ Cloud based documents are all synced to work laptops for offline access
- ✓ Redundancy is facilitated as far as reasonably practicable as per the Business Continuity Plan.
- ✓ Remote working capability