



STANDARD OPERATING PROCEDURES – INDIAN OCEAN

Standard Operating Procedures – Indian Ocean



Document Title	Standard Operating Procedures – Indian Ocean
Document Ref	SM/OPS/SOP/001
ISO Standard	ISO 28007:2015 / ISO 18788:2015 / ISO 28000:2022
ISO Clauses	28007: 4.4 / 18788: A.4.4 / 28000: 8.3
Version	1.0
Classification	Internal
Effective Date	2 April 2026
Review Date	2 April 2027
Approved By	Darren Watts, Group Compliance Director Pavel Shparber, CEO
Supersedes	SMS/SOP/IO/001 – reformatted and migrated to new referencing system

1. INTRODUCTION

This Standard Operating Procedure (SOP) serves as the guidance and rules for all Privately Contracted Armed Security Personnel (PCASP) employed by Seagull Maritime who are operating on board commercial vessels transiting the area formerly known as the High-Risk Area (HRA), namely the Red Sea, Gulf of Aden and Indian Ocean. It provides consistent direction to all PCASP conducting maritime security operations on-board commercial shipping, in-line with our company policies, industry standards, licensing, ISO 28007: 2015 and our client's contractual expectations.

It is the responsibility of Seagull Maritime and it's embarked PCASP to ensure the best possible risk mitigation is in place when on board client vessels.

For ease of use, this SOP has been issued as a series of annexes to enable direct reference to the relevant guidance or instruction as required.

Standard Operating Procedures are issued to Seagull Maritime Security Team Leaders and Team Members. They can only be appropriately implemented in conjunction with the Seagull Maritime Rules on the Use of Force and the Seagull Maritime Code of Conduct.

The procedures and guidance herein are compulsory, and no deviation is accepted without good cause or consent from Seagull Maritime.

Standard Operating Procedures are the step-by-step guidance and procedure Seagull Maritime utilise to carry out their duties, namely:

"The provision of privately contracted armed security personnel (PCASP) in the provision of armed maritime security services in the former High-Risk Area (Red Sea, Gulf of Aden and Indian Ocean)"

Standard Operating Procedures – Indian Ocean



2. SCOPE

This SOP applies to all Team Leaders and PCASP that are employed, engaged or contracted to conduct tasks for Seagull Maritime Security to protect a vessel and the persons on board from acts of piracy, armed robbery or hijacking.

NOTE: While guidance is provided within this SOP, hostile acts by state actors, e.g. local naval forces is not piracy and therefore the ability of Seagull Maritime PCASP to prevent such acts is restricted and is addressed accordingly within this SOP.

3. RESPONSIBILITIES

Responsibilities are as assigned within this SOP.

It is the responsibility of the Team Leader to ensure he and his Team Members have read and understood this SOP.

Where Team Members are uncertain or unaware of any relevant information, referred to or within, this SOP the Team Leader is required where possible to provide guidance and relevant training to the best of his ability.

Additional training requirements identified should be included on Appraisal Forms post disembarkation.

Role specific responsibilities are as detailed in job descriptions and as stated within the SOP.

All PCASP are required to adhere to the guidance and rules set out within this SOP. Failure to do so may result in disciplinary action.

4. LEGALITIES AND REFERRING DOCUMENTATION

This SOP has been written in accordance with all applicable flag state guidance, IMO circulars and direct references from BMP Maritime Security 2025.

Seagull Maritime operates a:

- Quality Management System to ISO 9001:2015,
- Security Management System to ISO 28000:2022 and ISO 28007:2015
- Security Operations Management System to ISO 18788: 2015

Personnel are reminded of their requirements and responsibilities under the Document Control Procedures and the Control of Records Procedures governed by the company Management Systems and to re-familiarise themselves wherever required.

All reporting as specified within this SOP is MANDATORY and failure to report may be classed as a disciplinary offence.

All required reports and documentation detailed within the SOP are available as part of the documentation issued on your deployment and it is the responsibility of the Team Leader to ensure that the most recent issue document is in use.

Standard Operating Procedures – Indian Ocean



The Seagull Maritime Compliance Department monitors all external references and standards relating to the provision of PCASP embarked on commercial vessels and will update this SOP accordingly.

Seagull Maritime respects human rights and are guided by international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact, the Voluntary Principles on Security and Human Rights (VPSHR) and the United Nations Guiding Principles on Business and Human Rights.

As an active member of the International Code of Conduct Association, we endorse the principles set forth by the International Code of Conduct for Private Security Service Providers (the "Code"). The Code articulates responsibilities of private security companies under human rights and international humanitarian law to ensure the responsible provision of private security services, particularly when operating in complex environments and we acknowledge the importance of these responsibilities.

5. AUTHORITY

At no time does any guidance or instruction in this SOP undermine or overrule the authority of the Master. The Master retains command and control of the vessel and is the overriding authority on board **AT ALL TIMES**.

Standard Operating Procedures – Indian Ocean



6. DEFINITIONS AND ABBREVIATIONS

Abbreviation	Definition	Notes
AO	AO	Area of Operations
BMP MS	BMP MS	BMP Maritime Security
CPA	CPA	Closest point of approach
COG	COG	Course over ground
CSO	CSO	Company Security Officer
EEZ	EEZ	Exclusive Economic Zone
GOG	GOG	Gulf of Guinea
HRA	HRA	High Risk Area
HOA	HOA	Horn of Africa
H&S	H&S	Health & Safety
IPL	IPL	In-Port limits
IRTC	IRTC	International Recommended Transit Corridor
ISPS Code	International Ship & Port Facilities Security Code	International Ship & Port Facilities Security Code
MSCIO	Maritime Security Centre Indian Ocean	Maritime Security Centre Indian Ocean
OOW	Officer of the Watch	Officer of the Watch
Seagull Ops	Seagull Operations Centre	Seagull Operations Centre
OPL	Off-Port Limits	Off-Port Limits
Personnel	Any person employed or contracted to Seagull Maritime Security as PCASP. This includes the Team Leader and all Team Members.	Any person employed or contracted to Seagull Maritime Security as PCASP. This includes the Team Leader and all Team Members.

Standard Operating Procedures – Indian Ocean



PPE	Personal Protection Equipment	Personal Protection Equipment
PCASP	Privately Contracted Armed Security Personnel	Privately Contracted Armed Security Personnel
PTR	Post Transit Report	Post Transit Report
RS	Readiness Status Level (of the security team)	Readiness Status Level (of the security team)
RUF	Rules for the Use of Force	Rules for the Use of Force
RV	Rendezvous Point	Rendezvous Point
SEA	Southeast Asia	Southeast Asia
Security Equipment	All Security Team operational equipment including rifles, binocular, night vision, non-lethal weapons, PPE, etc	All Security Team operational equipment including rifles, binocular, night vision, non-lethal weapons, PPE, etc
MSO	Maritime Security Operative	Maritime Security Operative
SMS	Seagull Maritime Security	Seagull Maritime Security
SOLAS	Safety Of Life at Sea	Safety Of Life at Sea
SOP	Standard Operating Procedure	Standard Operating Procedure
SSO	Ship Security Officer	Ship Security Officer
ST	Security Team	Security Team
STS	Ship to Ship	Ship to Ship
STCW95	Standard of Training Certification & Watch Keeping (1995)	Standard of Training Certification & Watch Keeping (1995)
TM	Team Member - Any person employed or contracted by Seagull Maritime Security as PCASP to form part of a security team	Team Member - Any person employed or contracted by Seagull Maritime Security as PCASP to form part of a security team
TL	Team Leader - The individual designated by Seagull Maritime Security to act as the leader of the Team	Team Leader - The individual designated by Seagull Maritime Security to act as the leader of the Team

Standard Operating Procedures – Indian Ocean



		Security to act as the leader of the Team
TTB	Time to bridge	Time to bridge
TW	Territorial Waters	Territorial Waters
UKMTO	United Kingdom Maritime Trade Organisation	United Kingdom Maritime Trade Organisation
UNCLOS	United Nations Convention of the Law of the Sea	United Nations Convention of the Law of the Sea
VBA	Vessel Based Armoury	Vessel Based Armoury
VPSHR	Voluntary Principles on Security and Human Rights	Voluntary Principles on Security and Human Rights

Standard Operating Procedures – Indian Ocean



7. CONTENTS

ANNEX STRUCTURE
A - DEPLOYMENT & EMBARKATION
B - VESSEL FAMILIARISATION
C - VESSEL HARDENING & MITIGATION MEASURES
D - ONBOARD ROUTINES
E - VESSEL DEFENCE
F - INCIDENT MANAGEMENT
G - WEAPONS & EQUIPMENT MANAGEMENT
H - DISEMBARKATION & POST TRANSIT

Annex A – Deployment & Embarkation



Document Title	Annex A – Deployment & Embarkation
Document Ref	SM/OPS/SOP/001-A
ISO Standard	ISO 28007:2015 / ISO 18788:2015 / ISO 28000:2022
ISO Clauses	28007: 4.4 / 18788: A.4.4 / 28000: 8.3 / 45001: 8.1
Version	1.0
Classification	Internal
Effective Date	2 April 2026
Review Date	2 April 2027
Approved By	Darren Watts, Group Compliance Director Pavel Shparber, CEO
Supersedes	SMS/SOP/IO/001 Annex A – reformatted and migrated to new referencing system

OVERVIEW

Security teams may be deployed from their home location to either a vessel-based armoury (VBA) or port for embarkation to the client vessel.

Personnel should refer to the Seagull Maritime Deployment Procedure Document for relevant information on uniform, equipment and documentation requirements prior to deployment.

This section of the SOP will provide the guidance and procedures to be followed upon deployment and for embarkation from VBA's.

DEPLOYMENT

VBA

Where you are to embark the client vessel from a VBA, Seagull Ops will, in conjunction with their VBA provider, arrange for your air travel to the nearest port and from there, a shuttle vessel to the VBA.

Personnel must ensure they always have all relevant travel documentation on their person including their passport and any required visa, which will have been provided on email by Seagull Ops.

Local agents assigned by either Seagull Maritime or the VBA provider will coordinate with the personnel on all required procedures of the local authorities.

For the avoidance of doubt, once deployment instructions are received and travel has commenced, personnel are not to consume alcohol or drugs in accordance with our Drugs & Alcohol Policy. Upon deployment, all personnel are considered "operational" until they have completed their contract and landed in their home destination.

Annex A – Deployment & Embarkation



Once at the VBA, personnel will be required to abide by the VBA's rules and regulations, including any code of conduct.

Seagull Ops will provide regular updates on the client vessel's ETA and task requirements.

Further information and requirements can be found within Seagull Maritime Deployed PCASP Manual.

Port

Where you are to embark the client vessel from a port, Seagull Maritime will work in conjunction with the local agent to arrange your air travel to the location and appropriate accommodation.

Where the client vessel will not be arriving imminently, the local agent will arrange for suitable accommodation near to the port for the security team.

Personnel must ensure they always have all relevant travel documentation on their person including their passport and any required visa, which will have been provided on email by Seagull Ops.

Local agents assigned by Seagull Maritime will coordinate with the personnel on all required procedures of the local authorities.

For the avoidance of doubt, once deployment instructions are received and travel has commenced, personnel are not to consume alcohol or drugs in accordance with our Drugs & Alcohol Policy. Upon deployment, all personnel are considered "operational" until they have completed their contract and landed in their home destination.

Seagull Ops will provide regular updates on the client vessel's ETA and task requirements.

Further information and requirements can be found within Seagull Maritime Deployed PCASP Manual.

PRE-EMBARKATION

Documentation

Seagull Ops will provide the Team Leader with the relevant task information; at a minimum this will include a Transfer Request Form (TRF) that details:

1. Vessel Name
2. Team Member Details
3. Weapon and Ammunition Details
4. Equipment Details

In addition, Seagull Ops will provide a Team Briefing on:

1. Vessel Details (Flag State, IMO No., Speed, Freeboard)
2. Transit Route
3. Task Special Requirements

Annex A – Deployment & Embarkation



The Team Leader is to acknowledge receipt of the task information and TRF at the earliest opportunity. The information should be reviewed by the Team Leader and all details checked to be correct.

The Team Leader is to verify Team Member details are correct by checking the passports of the assigned operatives against the details provided on the TRF.

Any errors or corrections required to the TRF should be identified to Seagull Ops at the earliest opportunity.

Risk Analysis

Seagull Ops will provide a copy of the task risk assessment. The risk assessment will detail the risk analysis for the transit route, embark and disembark locations and any relevant ports. It will also consider the latest piracy and activity on the transit route gathered by our intelligence partner, Vanguard Tech.

Pre-Transit Briefing

Within 24 hours of embarkation, the Team Leader will gather the security team to carry out a briefing ahead of the task.

The Team Leader should ensure he addresses the following:

Standard Operating Procedures

1. Review the Standard Operating Procedures with the Team
2. Ask questions of operatives to demonstrate their understanding of the procedures
3. Invite questions from operatives in relation to the procedures
4. Ensure all operatives have received and read this Standard Operating Procedure

Rules on the Use of Force

1. Review the Rules on the Use of Force with the Team
2. Ask questions of operatives to demonstrate their understanding of the rules and their implementation
3. Invite questions from operatives in relation to the rules
4. Ensure all operatives have received, read and understood the Rules on the Use of Force
5. Re-emphasise the authority of the Master on board the vessel
6. Re-emphasise the individual inherent right to self defence

Weapon Safety & Handling

1. Discuss and review with the Team the weapon systems intended for use on the transit
2. Gain an understanding of the Teams experience with the weapon system
3. Explain to the Team the expected levels of competency with the weapon system
4. Explain and plan weapon handling tests for when on-board
5. Explain the actions to be taken in the event of a negligent discharge
6. Explain the actions to be taken in the event of a weapon failure

Risk & Route Briefing

1. Discuss and review with the Team the provided risk assessment and the proposed route of the transit
2. If applicable, identify any high-risk areas and potential areas of concern

Annex A – Deployment & Embarkation



3. Discuss and review the vessel type and potential issues with protecting the vessel in certain conditions
4. If available, review the previous Post Transit Report for the vessel
5. If applicable and available, discuss and review safety/security limitations imposed by the vessel conditions, e.g. SOP - Tankers, LNG & LPG Vessels

Documentation and Policy

1. Remind the Team of their responsibilities to the company under the company Management Systems and their requirement to adhere to all company procedures and policies as stated
2. Remind the team of the Company Code of Conduct
3. Remind the team of the company's commitments under the Voluntary Principles on Security and Human Rights (VPSHR) and the International Code of Conduct for Private Security Service Providers (ICoCA), and their personal obligation to always uphold human rights
4. Review documentation is in order, i.e. passports, visas, yellow fever, seaman's book

2nd In Command

To ensure continuity of operational capability in the event of Team Leader incapacitation, the Team Leader is to nominate a Team Member as their designated 2nd in command or 2iC.

Selection of the 2iC should, wherever possible, be according to maritime experience, skill set and familiarisation with Seagull Maritime procedures.

Seagull Ops are to be advised of the designated 2iC on the embarkation report.

Weapons & Equipment - VBA Only

When embarking the client vessel from a VBA, the Team Leader should liaise with the Vessel Manager to attend the armoury to review and prepare the weapons and equipment ahead of embarkation. (Dependent on the location and operational activity on board, this may be immediately prior to embarkation or in advance.

On attending the armoury, the Team Leader is to check and review:

1. Serial Numbers of Weapons match those on the TRF
2. Ammunition calibre is suitable to the designated weapon
3. Ammunition amounts match those on the TRF
4. Weapons and Ammunition are serviceable and acceptable for use (visual check)
5. Equipment Boxes allocated match those on the TRF
6. Equipment has been visually checked for serviceability and is acceptable for use (visual check)

The Team Leader is **NOT** to accept the weapons if the above circumstances are not met. Any discrepancy or issue is to be reported to Seagull Ops immediately.

The Security Team is not to proceed to embarkation unless weapon and equipment issue is correct.

Once the check is completed, the weapons & equipment will be placed ready for embarkation by the VBA Armoury Team.

Annex A – Deployment & Embarkation



EMBARKATION PROCEDURE - VBA

The Team Leader is responsible for the safe embarkation of his TM's and all equipment from the VBA onto the client vessel.

Health & Safety

Life-saving equipment, life jackets and protective equipment such as hard hats will be supplied and are to be always worn.

If suitable safety equipment is not available, the Team Leader is to report this to Seagull Ops at the earliest opportunity.

If at any point during the embarkation process conditions are assessed as unsafe – including but not limited to adverse weather, sea state, inadequate safety equipment, or equipment failure – the Team Leader has the authority and the duty to suspend or abort the transfer. Personnel safety takes absolute priority over operational schedules. Any stop-work decision shall be reported to Seagull Ops immediately and recorded in the post-task report.

Team Leader is to ensure that under no circumstances must the team members embark the vessel with cigarette lighters on their person or any other form of device which produces a naked flame, these are prohibited items.

Suitable protective footwear and clothing are to be always worn through the embarkation process.

Body armour is not to be worn and should be secured in the Equipment Boxes.

All mobile phones and other electrical devices are to be switched OFF and not switched on again until the Master/Senior Officer completes the Vessel Safety Brief.

If Ship to Ship (STS) embarkation is required, contact Seagull Ops immediately for additional procedures and requirements.

Risk Assessments and Safety Guidance

A Health and Safety Risk Assessment (SM/HSE/RA/002) has been completed for vessel transfer operations. The full risk assessment is available on request from Seagull Ops or the Compliance Department. A method statement for this activity is also available and should be reviewed prior to any transfer. Method statements can be accessed or requested via the Seagull Safety Reporting App at report.seagullmaritimeltd.com.

A Basic Risk Assessment Guide (BRAG) for vessel transfer operations is issued with this SOP as a quick-reference safety guide. BRAGs are also available via the Documents Library on the Seagull Safety Reporting App at report.seagullmaritimeltd.com. The BRAG is written in plain language and summarises the key hazards, controls and actions for this activity. Team Leaders should ensure all team members have read and understood the BRAG before the transfer takes place.

Reporting Unsafe Conditions and Near Misses

All personnel have a duty to report any unsafe condition, near miss, incident or injury – no matter how minor. Reports can be submitted at any time using the Seagull Safety Reporting App at

Annex A – Deployment & Embarkation



report.seagullmaritimeltd.com. The app is accessible from any device with an internet connection. Reporting is confidential and no person will be penalised for raising a genuine safety concern.

In the event of a serious injury or dangerous occurrence, the Team Leader must report to Seagull Ops immediately by phone in addition to submitting a report via the app.

Joining the Vessel

Typically, the security team will be transported to the client vessel by RHIB or a small crewing vessel (transfer vessel).

The Vessel Manager or Coxswain will provide a safety briefing prior to embarking the transfer vessel. This briefing is to be always followed and any failure to do so will be considered a potential disciplinary offence.

The Vessel Manager and Coxswain will have conducted a risk assessment of the conditions and permit the transfer to commence.

As stated, appropriate protective equipment, e.g. helmets and lifejackets will be provided.

In exceptional circumstances, if it is in the opinion of the Team Leader there is insufficient Life Saving Equipment, appliances or any other safety concerns that could pose a threat to the safe transfer of the team, the Team Leader is to refuse boarding of the launch and inform Seagull Operations immediately by phone.

Weapons and equipment will be transferred to the transfer vessel under the supervision of the Team Leader and the VBA team.

The Team Leader is responsible for ensuring all weapons and equipment has been transferred.

After boarding the transfer vessel, the team must always follow the coxswain's and vessel crew's instructions.

The transfer vessel will be in direct communication with the client's vessel and will arrange the embarkation at a prearranged RV point.

Once alongside the client vessel, the coxswain and transfer vessel team will prepare for the transfer of the personnel and equipment.

Weapons and equipment are to be prepared for transfer by the transfer vessel team and in coordination with the client vessel's Master. Security personnel are NOT to be involved in securing the equipment to load lines, cranes or other equipment used for transfer.

Personnel will embark from alongside via a pilot ladder. In poor weather or extreme conditions, alternative methods may be used such as a crane.

The Team Leader will decide the embarkation order of the Security Team.

Once on deck of the client vessel, the Team Leader is responsible for ensuring all weapons and equipment has been loaded on-board and nothing has been left behind on the transfer vessel.

Annex A – Deployment & Embarkation



Additional Notes:

Personnel are to ensure personal belongings are secured and of a suitable weight for transfer.

The carriage of excess weight or additional, non-essential personal items is prohibited unless agreed in advance with the VBA Vessel Manager and the client vessel.

Passports and important documents should be sealed in bags or suitable waterproof protection and secured against the body.

Personnel are to never secure themselves to weapons and equipment boxes during a transfer.

EMBARKATION PROCEDURE - PORT

The Team Leader is responsible for the safe transfer to the port and embarkation of his TM's and all equipment from the port onto the client vessel.

Port Procedures

The local agent will arrange suitable transport from airport/accommodation to the port for embarkation.

All port formalities including customs and immigration will be managed by the local agent. The security team are to comply with all reasonable requests throughout and treat all local officials with respect and patience.

The local agent will then take the security team to the armoury to collect the weapons and equipment.

Weapons & Equipment

On reaching the local armoury, the Team Leader will review and prepare the weapons and equipment ahead of embarkation.

On attending the armoury, the Team Leader is to check and review:

1. Serial Numbers of Weapons match those on the TRF
2. Ammunition calibre is suitable to the designated weapon
3. Ammunition amounts match those on the TRF
4. Weapons and Ammunition are serviceable and acceptable for use (visual check)
5. Equipment Boxes allocated match those on the TRF
6. Equipment has been visually checked for serviceability and is acceptable for use (visual check)

The Team Leader is NOT to accept the weapons if the above circumstances are not met. Any discrepancy or issue is to be reported to Seagull Ops immediately.

The Security Team is not to proceed to embarkation unless weapon and equipment issue is correct.

Once the check is completed, the weapons & equipment will be transported to the port side for embarkation to the transfer vessel by the local agent.

Annex A – Deployment & Embarkation



Health & Safety

Life-saving equipment, life jackets and protective equipment such as hard hats will be supplied and are to be always worn.

If suitable safety equipment is not available, the Team Leader is to report this to Seagull Ops at the earliest opportunity.

If at any point during the embarkation process conditions are assessed as unsafe – including but not limited to adverse weather, sea state, inadequate safety equipment, or equipment failure – the Team Leader has the authority and the duty to suspend or abort the transfer. Personnel safety takes absolute priority over operational schedules. Any stop-work decision shall be reported to Seagull Ops immediately and recorded in the post-task report.

Team Leader is to ensure that under no circumstances must the team members embark the vessel with cigarette lighters on their person or any other form of device which produces a naked flame, these are prohibited items.

Suitable protective footwear and clothing are to be always worn through the embarkation process.

Body armour is not to be worn and should be secured in the Equipment Boxes.

All mobile phones and other electrical devices are to be switched OFF and not switched on again until the Master/Senior Officer completes the Vessel Safety Brief.

If Ship to Ship (STS) embarkation is required, contact Seagull Ops immediately for additional procedures and requirements.

Risk Assessments and Safety Guidance

A Health and Safety Risk Assessment (SM/HSE/RA/002) has been completed for vessel transfer operations. The full risk assessment is available on request from Seagull Ops or the Compliance Department. A method statement for this activity is also available and should be reviewed prior to any transfer. Method statements can be accessed or requested via the Seagull Safety Reporting App at report.seagullmaritimeltd.com.

A Basic Risk Assessment Guide (BRAG) for vessel transfer operations is issued with this SOP as a quick-reference safety guide. BRAGs are also available via the Documents Library on the Seagull Safety Reporting App at report.seagullmaritimeltd.com. The BRAG is written in plain language and summarises the key hazards, controls and actions for this activity. Team Leaders should ensure all team members have read and understood the BRAG before the transfer takes place.

Reporting Unsafe Conditions and Near Misses

All personnel have a duty to report any unsafe condition, near miss, incident or injury – no matter how minor. Reports can be submitted at any time using the Seagull Safety Reporting App at report.seagullmaritimeltd.com. The app is accessible from any device with an internet connection. Reporting is confidential and no person will be penalised for raising a genuine safety concern.

In the event of a serious injury or dangerous occurrence, the Team Leader must report to Seagull Ops immediately by phone in addition to submitting a report via the app.

Annex A – Deployment & Embarkation



Joining the Vessel

Typically, the security team will be transported to the client vessel by RHIB or a small crewing vessel (transfer vessel).

The Captain of the transfer vessel or Coxswain will provide a safety briefing prior to embarking the transfer vessel. This briefing is to be always followed and any failure to do so will be considered a potential disciplinary offence.

The Captain, Local Agents and Coxswain will have conducted a risk assessment of the conditions and permit the transfer to commence.

As stated, appropriate protective equipment, e.g. helmets and lifejackets will be provided.

In exceptional circumstances, if it is in the opinion of the Team Leader there is insufficient Life Saving Equipment, appliances or any other safety concerns that could pose a threat to the safe transfer of the team, the Team Leader is to refuse boarding of the launch and inform Seagull Operations immediately by phone.

Weapons and equipment will be transferred to the transfer vessel under the supervision of the Team Leader and the transfer vessel team.

The Team Leader is responsible for ensuring all weapons and equipment has been transferred.

After boarding the transfer vessel, the team must always follow the Captain/coxswain's and vessel crew's instructions.

The transfer vessel will be in direct communication with the client's vessel and will arrange the embarkation at a prearranged RV point.

Once alongside the client vessel, the coxswain and transfer vessel team will prepare for the transfer of the personnel and equipment.

Weapons and equipment are to be prepared for transfer by the transfer vessel team and in coordination with the client vessel's Master. Security personnel are NOT to be involved in securing the equipment to load lines, cranes or other equipment used for transfer.

Personnel will embark from alongside via a pilot ladder. In poor weather or extreme conditions, alternative methods may be used such as a crane.

The Team Leader will decide the embarkation order of the Security Team.

Once on deck of the client vessel, the Team Leader is responsible for ensuring all weapons and equipment has been loaded on-board and nothing has been left behind on the transfer vessel.

Additional Notes:

Personnel are to ensure personal belongings are secured and of a suitable weight for transfer.

The carriage of excess weight or additional, non-essential personal items is prohibited unless agreed in advance with the local agent and the client vessel.

Annex A – Deployment & Embarkation



Passports and important documents should be sealed in bags or suitable waterproof protection and secured against the body.

Personnel are to never secure themselves to weapons and equipment boxes during a transfer.

Annex B – Vessel Familiarisation



Document Title	Annex B – Vessel Familiarisation
Document Ref	SM/OPS/SOP/001-B
ISO Standard	ISO 28007:2015 / ISO 18788:2015 / ISO 28000:2022
ISO Clauses	28007: 4.4 / 18788: A.4.4 / 28000: 8.3 / 45001: 8.1
Version	1.0
Classification	Internal
Effective Date	2 April 2026
Review Date	2 April 2027
Approved By	Darren Watts, Group Compliance Director Pavel Shparber, CEO
Supersedes	SMS/SOP/IO/001 Annex B – reformatted and migrated to new referencing system

OVERVIEW

Once safely embarked onto the client vessel, the Team Leader and the security team are required to quickly familiarise themselves with the Master, the vessel and the vessel rules. It is also critical that the Team Leader establishes the planned routine for the duration of the task with the Master.

COMMAND AND CONTROL

The Master is the overriding authority on board the vessel.

It is important that the Team Leader, Security Team, Master and Crew understand and work within a defined command and control structure.

Command and control of each client vessel always resides with the Master. The Master has a duty to ensure that at no time is the safe navigation of his vessel compromised, and this duty transcends all others that he may have. The Master cannot delegate command, conduct, charge or the navigation of his vessel to an embarked third party.

Protocols For Working with the Master

The Team Leader will establish with the Master the delegation of command should the Master become incapacitated.

The Team Leader will establish and periodically review with the Master, the way in which intentions, instructions and guidance can be communicated to and implemented by the Master.

Security personnel must always be aware that they can only advise the Master and request that he pursue a course of action and not give orders.

Annex B – Vessel Familiarisation



Team Leaders should establish with the Master the protocol for the use of bridge communications systems; in particular, which systems they are authorised to use at will and those for which they must obtain prior permission from the on-watch Deck Officer, e.g. email.

Should any exercises or drills be planned or conducted, it should be established and understood with the Master the rules to be followed whilst conducting the exercise and should include a simple method of identifying the transition to a real incident should one occur whilst conducting an exercise.

Master's Authority

At all times, it is essential to acknowledge that the Master remains in command and is the overriding authority on board.

The Master retains the ultimate control and responsibility for the safety and security of the ship.

The Master has overall control of the vessel, and any decisions made by the Master shall be binding.

The Master cannot order PCASP to open fire or direct fire at any person. Rules on the Use of Force should be discussed, reviewed and confirmed with the Master.

The Team Leader shall coordinate with the Master before firearms are deployed, save in circumstances where to coordinate with the Master would interfere with PCASP's right to self-defence.

If the Master is unavailable, delegation of control of the vessel should already be agreed and the exact procedure to be followed shall be agreed with the ship owner and documented in the Ship Security Plan.

Command and Control of the Onboard Security Team

The Team Leader retains command and control of the security team.

Master	Complete Authority for all matters on board vessel
Ships Officers	Report to the Master, can be assigned by Master to issue instruction to the Security Team
Crew	Under direct supervision and command of the Master, Security Team can only issue instruction to ship crew via the Master
Security Team Leader	Supervision and Instruction of the Security Team. Provision of guidance and advice on security related matters to the Master. Under the authority of the Master while on board the vessel
Security Team Member	Under the supervision and command of the Team Leader. No capability for the issuing of instructions to the Master or Crew
Seagull Operations	Supervision and remote command of the Security Team. Liaison between Security Team, Vessel and Client
Client	Co-ordination and liaison between Master and Operations

Annex B – Vessel Familiarisation



FAMILIARISATION

The Team Leader, once embarkation is completed and his team are safely onboard, is responsible for ensuring he and his team meet and introduce themselves to the Master.

Seagull Maritime Master Briefing

On embarkation, the Team Leader shall present the Seagull Maritime Master Briefing document to the Master. This document provides the Master with a formal overview of the security team's operating procedures, rules on the use of force, command and control structure, and key contact information. The Master Briefing should be discussed with the Master to ensure mutual understanding and retained on the bridge for the duration of the transit.

Introduction

The Team Leader is to formally introduce himself and his team, ensuring that he:

1. Introduces the Team Members
2. Identifies the nominated 2IC to the Master
3. Makes suitable arrangement for the storage of the weapons and equipment.

A more in-depth and formal co-ordination briefing may take place immediately or be arranged for a more convenient time once embarkation procedures are commenced and the client vessel has exited the embarkation area.

Weapons & Equipment

The Team Leader, with the Master will:

1. Verify all weapons are unloaded and made safe
2. Verify weapon types and serial numbers are correct
3. Locate and agree on a suitable secure storage position for the equipment boxes containing the weapons, ammunition and equipment. Weapons and ammunition should be stored separately. Storage should be securable by locking device and accessible only by the Master and Team Leader.
4. Ensure the Master and his team are made fully aware that the weapons and equipment are for the sole use of the Seagull Maritime Security Team and are not moved or touched. No pictures are to be taken.
5. Identify and verify if there are any other weapons on board other than those embarked by Seagull Maritime. If so, where are they secured and what procedure is in place to secure the weapons if going in and out of Port. Explain that Seagull Ops are responsible only for the logistics of Seagull Maritime weapons in and out of port. The Team Leader should immediately advise Seagull Ops if other weapons are on board.
6. Ensure all team members are familiarised with where security equipment is located.

Further guidance on weapons and equipment is detailed under Weapons & Equipment Management.

Annex B – Vessel Familiarisation



Coordination Briefing

The detailed coordination briefing should cover the following:

Tasking Information

Verify with the Master:

1. Destination
2. Route
3. Cargo
4. ETA to the High-Risk Area or next known risk area
5. Vessels top speed
6. AIS policy
7. Vessel administration points, e.g. asking the Master about signing and stamping security log sheets, Seaman Discharge Books and any other company paperwork that requires a signature and the vessels stamp etc.

If any information provided by the Master differs to what is provided, ensure Seagull Ops are advised at the earliest opportunity.

Procedures and Use of Force

1. Explain the Seagull Maritime Standard Operating Procedures and Rules on the Use of Force.
2. Explain clearly and concisely the need for the Master's permission to invoke the Use of Force.
3. Explain clearly and concisely that the Master remains the overriding authority at all times.

When briefing the Master on the Rules on the Use of Force, the Team Leader shall reference the Voluntary Principles on Security and Human Rights (VPSHR) and the International Code of Conduct for Private Security Service Providers (ICoCA), both of which underpin Seagull Maritime's approach to the proportional use of force and the protection of human rights during operations.

Intelligence

Present the latest intelligence picture of any recent piracy events, or any other security incidents on the known route. If available, share the defined risk level from the provided task risk analysis.

Vessel Protection & Assessment

Explain to the Master the importance of the vessel security assessment and:

1. Arrange a time and plan with the Master for a vessel familiarisation and security assessment tour for the security team
2. Ask the Master for any risk assessments that have been made by the vessel staff or client to assist you in your risk assessment process.
3. Check with the Master if the Ship Security Plan identifies any specific requirements for the on-board security team

Note: Access to the Ship Security Plan is not required and should not be requested

4. Formulate a brief but immediate plan for action in the event of an early attack before all security precautions and routines have been structured and put in place.

Annex B – Vessel Familiarisation



5. Identify what is the vessel's current MARSEC level and is it going to be raised during your time on board the vessel.
6. Discuss the watch rotation for the security team with the Master. Identify with the Master if on watch duties are expected to be commenced immediately or upon entrance to the High-Risk Area.
7. Note: The Team Leader (TL) should fall in watch with the Master. In the case where the Master does not conduct a watch, the Team Leader is to use his own discretion in setting the watch rotation
8. Once available, provide the Master with a copy of the watch rotation.
9. If additional lookouts may be required, discuss and request the Master nominate crew members to act as lookouts. Explain lookouts are required to stand watch in locations where identified vulnerable areas can be monitored

Vessel Safety

It is important for the safety of the security team that they are familiarised with on-board safety requirements specific to the vessel embarked.

It is the responsibility of the Team Leader to request the Vessel Safety Brief from the Master and to ensure the Team are all present when it is given.

All Operatives are required to abide by and adhere to all vessel safety rules and guidelines while on board the vessel.

The TL is to ensure he establishes:

1. What, if any, PPE may be required when moving around the vessel (e.g. safety shoes, hi-vis vests)
2. Critical health and safety considerations such as any dangerous cargo or spaces and any restricted areas and onboard environmental procedures
3. Any vessel specific risk assessments that may be applicable while onboard the vessel.
4. Assigned muster point and lifeboat station.
5. MOB procedures and locations of lifesaving equipment.
6. Where any rules or guidelines are deemed to potentially interfere with the protection of the vessel, a common-sense approach is expected to be taken and consultation with Seagull Ops should be sought as soon as possible.

Any breach of vessel safety rules by a Security Team member will be classed as misconduct and may be subject to a disciplinary investigation.

If the vessel is a tanker, LNG or LPG vessel, Team Leaders should also refer to the Seagull Maritime Additional Guidance and Procedures for LNG, LPG and Tanker Vessels.

General Vessel Administration

Establish and understand the day-to-day routine of the vessel.

Request access to your team's accommodation. Preferably, obtain accommodations as close to the bridge as possible (this will shorten your response time). Emphasise to the Master the effectiveness of a shorter response time to the bridge.

Ensure all team members are familiarised with where each other is accommodated.

Annex B – Vessel Familiarisation



Identify and request to be shown messes, heads, bathrooms, laundry and welfare facilities and establish the rules for use by the security team.

Discuss mealtimes and establish vessel guidelines for off-duty personnel and access to facilities.

Training and Drills

Emphasise to the Master the importance of training and drills to enhance the security of the vessel and the performance of the security team alongside the crew.

Request and arrange a suitable time for the crew briefing.

Request and arrange a suitable time for an Anti-Piracy drill to be completed. Ideally the drill should be completed before entry into any high-risk area.

Whilst conducting exercises, there is to be a clear understanding by the Master, TL, Team Members and crew of the rules to be followed whilst conducting the exercise and should include a simple method of identifying the transition to a real incident should one occur whilst conducting an exercise.

Reporting and Communication

Team Leaders should establish the protocol for the use of bridge communications systems; in particular, which systems they are authorised to use at will and those for which they must obtain prior permission from the on-watch Deck Officer.

Discuss and verify the following:

1. The reporting procedure for the vessel to the UKMTO
2. Will the vessel be registered with MSCIO?
3. Is the vessel registered to join or travel in any convoy or naval escort, or will the vessel just carry on at best speed?
4. Inform the Master what radios the security team uses and agree on a channel to be used for radio communication.
5. Explain Seagull Maritime reporting procedures and request access to communication facilities, i.e. internet to comply, e.g. daily reporting.

CREW BRIEFING

The crew briefing should assist the Team Leader in the training of the ship's crew, instil confidence in the Master and the Crew of the Security Team's abilities and provide reassurance.

The Briefing

Gather the crew and with your team conduct a security briefing, ensuring you cover:

1. Tactics and approach used in modern day piracy
2. A review of recent pirate attacks/hijackings/activity.
3. The aims of the Security team i.e., protect the crew, protect the vessel, and protect the cargo.
4. The training to be carried out, and explain that an Anti-Piracy drill will be conducted covering:
5. Lockdown procedure
6. Upgrading the Readiness Level on board.
7. Individual assignments during an attack within the crew and Security team.

Annex B – Vessel Familiarisation



8. If transiting the Red Sea/Gulf of Aden, address the additional threat from Houthi Forces including:
 - a. Additional vigilance for the detection of drones or water borne IED's.
 - b. "Look Up" - perform visual surveillance of the surrounding skies
 - c. "Listen" - drones will produce distinct audible sound on approach
 - d. Safe "brace" positions ensuring crew move to the far side of the vessel from the approaching drone/IED
 - e. Evacuate to lower decks if a drone or IED is identified as on approach
9. Explain to the crew the Security Team Readiness States as applicable to them (not to be confused with the vessel MARSEC level):

RS Level One - No threats, normal state of vessel while transiting in piracy waters

RS Level Two - Potential threats detected or possible. All non-essential crew to muster at designated muster point.

RS Level Three - Confirmed threat or attack. All crew to muster in citadel.

Remind all crew members that no vessel has ever been hijacked doing 18 knots or more or hijacked with an armed security team on board.

This is the ideal time for the TL to instil confidence into all crew members and reassure them that the risk to them is significantly reduced whilst a security team is on board their vessel.

HEALTH & SAFETY

Vessel familiarisation is a safety-critical activity. Team Leaders and security personnel should be aware of the health and safety risks associated with boarding a new vessel and working in an unfamiliar environment.

Seagull Maritime has produced Basic Risk Assessment Guides (BRAGs) covering key operational hazards including vessel familiarisation, vessel transfers, working at height, confined spaces, manual handling, working in hot environments, and night operations. These are available via the Seagull Safety Reporting App at report.seagullmaritimeltd.com or from Seagull Ops or the Compliance Department.

Full risk assessments and method statements are held by Seagull Maritime and can be requested via the Seagull Safety Reporting App or from Seagull Ops or the Compliance Department. Team Leaders should ensure all personnel are familiar with the relevant BRAGs before commencing familiarisation activities.

All near-misses, hazards and incidents should be reported immediately via the Seagull Safety Reporting App or, where internet access is not available, directly to Seagull Ops or the Compliance Department.

Annex C – Vessel Hardening & Mitigation Measures



Document Title	Annex C – Vessel Hardening & Mitigation Measures
Document Ref	SM/OPS/SOP/001-C
ISO Standard	ISO 28007:2015 / ISO 18788:2015 / ISO 28000:2022
ISO Clauses	28007: 4.4 / 18788: A.4.4 / 28000: 8.3 / 45001: 8.1
Version	1.0
Classification	Internal
Effective Date	2 April 2026
Review Date	2 April 2027
Approved By	Darren Watts, Group Compliance Director Pavel Shparber, CEO
Supersedes	SMS/SOP/IO/001 Annex C – reformatted and migrated to new referencing system

OVERVIEW

Seagull Maritime supports and endorses the recommendations of BMP-MS with regards to potential mitigation measures on board vessels transiting high-risk areas. The purpose of mitigation measures is to deter, delay and deny hostile actors from boarding the vessel.

Most vessels that we embark upon will already have implemented well-planned and rehearsed measures as part of their Vessel Hardening Plan. This should, as per BMP-MS, be a layered defence system that increases the complexity of boarding or taking control of a vessel. Vessels will have undertaken specific risk assessments ahead of transiting the high-risk areas, this risk assessment will most likely have included the need for the embarkation of our armed security team.

Seagull armed security teams are on-board to act as a further deterrent to potential attackers as well as having the potential to help deny a potential attack should other mitigation measures fail. As part of our role onboard, the Team Leader and security team will conduct a vessel familiarisation tour, within which he will assess the vessel's existing defences and mitigation measures.

The vessel familiarisation tour should achieve the following:

Provide an opportunity to assess the existing measures in place and, where appropriate, provide advice to the Master on possible further alterations to the vessel to further reduce the risk of attack. Familiarise the security team with the vessel layout and existing mitigation measures, allowing the Team Leader to plan his defensive strategies in the event of an attack ensuring they take advantage of existing defences, best lines of sight and arcs of fire.

The Vessel Defence Assessment is specific to the aims of deterring and preventing acts of piracy and not to be compared or used in place of the Ship Security Assessment under the ISPS Code.

Seagull Maritime Armed Security Teams are on board the vessel for security duties to deter and prevent acts of piracy and not those under the ISPS Code.

Annex C – Vessel Hardening & Mitigation Measures



Delaying attackers at any stage of an attack assists in the deterrence of piracy from greater distances, buys additional time for additional security measures, can increase the chance of Naval Force intervention and helps limit any progression in the escalation of force and achieve protection of the vessel through non-violent means thereby reducing the potential for using force in line with our Use of Force principles.

The Team Leader's assessment should focus on the 3 layers of defence as well as additional considerations such vessel routing and manoeuvring ability, alarms, watchkeeping and secure muster locations around the ship, such as the citadel.

LAYERED DEFENCE ASSESSMENT

The Team Leader will conduct his assessment and provide any recommendations to the Master. The Team Leader will also provide a detailed report on the ship's defensive measures in his Post-Transit Report.

Physical Barriers

The 1st layer of defence, as per BMP-MS, is the use of physical barriers to limit the potential for attackers to board the vessel by increasing the difficulty of the climb and getting onto the vessel itself.

- a) Is there razor wire (barbed wire) fitted around the perimeter of the vessel?
- b) If so, is the razor wire adequately secured and of appropriate quality?
- c) Are any vulnerable climbing points covered?
- d) Does the vessel have any water hoses, foam monitors or water cannons that can be deployed?
- e) If so, are they rigged in fixed positions to best defend the vessel BEFORE entering the high-risk area?
- f) Is water hose coverage acceptable and well directed?
- g) Plastic or custom-made barriers fitted around the perimeter that limit boarding?
- h) Spikes installed on the outer side of handrails.
- i) Are sandbags, water barrels or steel plating available? These can be placed around vulnerable areas such as the bridge to delay access and can provide a defensive layer for armed operatives to fire from.

As per BMP-MS, any physical barriers, existing or proposed should not compromise the ability to abandon the ship or manage other emergencies such as a fire.

Access to critical areas of the vessel

If a boarding does occur, preventing access to critical areas of the ship and or "funneling" the attackers down a route can help thwart theft, hijack attempts or hostage situations. Working on the basis the physical barriers have been breached:

- a) Are stairwell doorways chocked or reinforced?
- b) Are entry/exit doors hardened with additional locks?
- c) Locking bars installed across door frames?
- d) Access is controlled and secure areas are checked, and all doors are secured on handover routines?
- e) Are external windows reinforced to prevent access?

Annex C – Vessel Hardening & Mitigation Measures



- f) Are windows fitted with deadlights or blank covers?
- g) Are bars installed across windows?
- h) Are all external doors/watertight doors, entry/exit from accommodation block secured?
- i) External stairwells are blocked or secured to prevent easy use?
- j) Metal plates are fitted to obstruct climbing on stairways?
- k) Hatches and vents are secured and locked down?

Bridge Protection

- a) Is there sufficient ballistic protection on bridge wings or covered firing points?
- b) Is there anti-shatter film on bridge windows?
- c) Are flares accessible and ready to use?
- d) Are binoculars available for lookouts?
- e) Is there a RPG screen / netting?
- f) Are mobile search lights available?
- g) Are there removable steel / aluminium plates for side and rear bridge windows?
- h) Are access points to bridge properly secured?
- i) Is there chain link fence on sides and rear of bridge?
- j) Are stairs to Bridge and climbing points secured with razor wire?
- k) Is there a grab bag ready for a citadel retreat?
- l) Is two-way communication with the citadel possible?

Additional Considerations

Review on deck routines with Master. Minimise activity out on deck when transiting the Yemeni coastline.

Check all tools and equipment are secured and locked away after use as these can aid attackers in gaining entry.

Check any gas cylinders or flammable liquid containers stored on deck are covered by ballistic protection from small arms fire.

Team Leader should note the locations of gas cylinders and flammable liquid containers when considering the deployment of his team in an active attack to avoid the potential for accidents and to not draw fire to such containers.

MUSTER POINTS & CITADELS

The Team Leader should consult with the Master on the provision of a Citadel. The vessel's company risk assessment should already have identified the location of sufficient security muster points and a location for a Citadel should it be required.

With the now increased potential for missile or WBIED strikes, the use of a Citadel may not always be the ideal scenario. Therefore, on the assessment, the Team Leader should also review with the Master designated muster points that can be used in alternative cases where a Citadel is not appropriate.

Muster Points

Muster points should be considered in areas that provide the best protection for crew.

As per BMP-MS, muster points should be above the waterline in the event that an attack causes a hull breach.

Annex C – Vessel Hardening & Mitigation Measures



Central stairways, protected by accommodation blocks are often suitable as they will offer multiple escape routes.

Spaces with windows should be avoided.

The Team Leader and security team should familiarise themselves with all designated muster points and factor in their locations when considering their deployment and area of operation if required to respond to an attack.

UAV MITIGATIONS

The Team Leader should discuss with the Master the current planned actions on board in the event of a UAV attack. The Security Team nor the vessel can mitigate against such attacks, so it is essential emergency response procedures are in place.

As taken from BMP-MS, the following is recommended to be implemented if not in place already:

1. Sound the Alarm.
2. Muster crew in appropriate PPE including hard hats in appropriate location (Avoid below waterline and large amounts of glass).
3. Brace for impact.
4. Consider switching off AIS or other tracking communications followed by a major course alteration if safe to do so.
5. Evasive manoeuvring.

Security team actions in the event of a UAV attack are detailed in the Vessel Defence section of this SOP.

WBIED MITIGATIONS

The Team Leader should discuss with the Master the limited mitigation against WBIED attacks.

The Security Team may try to disable the WBIED in line with the procedures detailed in the Vessel Defence section of this SOP and our Rules on the Use of Force.

Emergency procedures should be discussed with the Master in the event of a successful WBIED attack.

MISSILE MITIGATIONS

The only mitigation available to the vessel to avoid missile attack is to avoid the area completely (as per BMP-MS).

The Team Leader and Security Team should discuss with the Master, and familiarise themselves with, the emergency response procedures in the event of missile impact.

HELICOPTER BOARDING MITIGATIONS

As recognised in BMP-MS, such a tactic is likely to only be instigated by a state actor.

Annex C – Vessel Hardening & Mitigation Measures



The Team Leader should verify with the Master that the security team would not attempt to engage state actors with weapons to prevent risk of escalation.

However, if a credible threat is evaluated and identified, the Team Leader should recommend the following mitigations can be used:

1. Foam monitors can be used to spray the deck and create water mist.
2. Fouling of the helipad and open decks with nets or obstruction to prevent landing
3. Evasive manoeuvres to move the vessel away from abseiling ropes.
4. Steam towards territorial waters at full speed.
5. Course alteration to maximise rolling of the ship.

It will be the sole authority of the Master to validate the threat and make the decision to attempt these mitigation measures and attempt to deny landing of the craft or persons onto the vessel.

Actions on helicopter boarding by the Security Team are identified in the Vessel Defence section of this SOP.

THE CITADEL

The Citadel is a critical element of crew protection with many successful boardings abandoned or ended by Naval Forces due to the security of the citadel.

The Team Leader should request the Master show him the citadel.

- a) Is there VHF and a Sat Phone with independent power supply?
- b) Is the Sat Phone aerial disguised on ship's deck?
- c) Is there enough food and water for 72hrs+ for all crew?
- d) Does the Citadel have blankets and or bedding?
- e) Are there toilet and waste facilities?
- f) Are there medical/trauma supplies?
- g) Is there an emergency contact number list?
- h) Is breathing apparatus available?
- i) Is firefighting equipment available?
- j) Is there sufficient space for the entire crew?
- k) Is there a CCTV monitoring system within the citadel?
- l) Is the access door to Citadel sufficiently reinforced?
- m) Are there 3 x Breach points total leading to Citadel?
- n) Is there an ability to control propulsion/steering of the vessel from within or a dead ship facility?
- o) Is fixed or handheld GPS facility available?

Use of the Citadel is only authorised by the Master. The Team Leader should discuss with the Master the use of the Citadel in the event of an attack as per the procedures within this SOP.

The Team Leader should emphasise the importance of the Citadel to the Master in the event that the existing Citadel is lacking critical facilities.

Annex C – Vessel Hardening & Mitigation Measures



SECURITY TEAM CONSIDERATIONS

As per BMP-MS, a good lookout is one of the most effective methods of ship protection, they can identify a suspicious approach or attack early, allowing for a quicker response from the security team and other defences being deployed.

While conducting the assessment, the Team Leader should give consideration to the following:

Lookouts

Utilising additional lookouts in key or vulnerable areas ensures an early detection system and provides an effective visual deterrent.

The provision of crew members as additional lookouts is under the sole discretion of the Master.

However, their positioning on board the vessel, dependent on vessel type and layout, requires careful consideration and planning.

Positioning & Location

Lookouts should not necessarily be confined to the Upper Deck alone. A position close to the water can provide the best opportunities for detection either visually or by sound.

Arcs of Observation

Sentry positions should be selected so that the lookout has good fields of view. Whenever possible blind spots caused by ship structure should be avoided.

Protection

Positions should be sited so that the lookout is afforded good hard cover in the event of attack.

Team Leaders are responsible for the correct positioning and safety of all posted lookouts based on the vessel type and layout. However, all security team members are responsible for their own safety also.

Communications

Lookouts should be able to communicate using radio but equipment limitations may prevent this. It will therefore be necessary to take into account the location and availability of broadcast and interphone communications when making the lookout plan.

Security Team Deployment Positions

While touring the vessel, this is the ideal opportunity to identify the best possible positions to place the security team in the event of an attack based on the angle and directions of approach and considering:

Arcs of Fire
Line of Sight
Protection and Cover

Annex C – Vessel Hardening & Mitigation Measures



IMPLEMENTATION OF MITIGATION MEASURES

The implementation of potential mitigation measures not already in place and identified during the assessment can be restricted by what is available on board the vessel at the time. Not all vessels will be able to meet the protection requirements or have the equipment available to implement sufficient counter measures.

Where this is the case, document the 3 most urgent recommendations for completion in the Post Transit Report. Where possible, specify any specific equipment required, the level of priority appropriate to the recommendation and the reasons for the recommendation.

HEALTH & SAFETY

If the Security Team are requested to assist with implementing mitigation measures, always bear in mind the Health & Safety advice contained in this procedure document and ensure that relevant and suitable risk assessments are conducted or obtained.

Appropriate PPE should be provided by the vessel and always worn, e.g. safety gloves for razor wire, safety boots (all personnel should be deployed with appropriate footwear).

The Team Leader should verify with Seagull Ops that it is permitted to assist.

The Team Leader should also ensure that any assistance provided with implementing measures will not interfere with the protection of the vessel and the conducting of the security team's primary duties.

Seagull Maritime has produced Basic Risk Assessment Guides (BRAGs) covering key operational hazards including vessel hardening, working at height, manual handling, and confined spaces. These are available via the Seagull Safety Reporting App at report.seagullmaritimeltd.com or from Seagull Ops or the Compliance Department.

Full risk assessments and method statements for vessel hardening activities can be requested via the Seagull Safety Reporting App or from Seagull Ops or the Compliance Department.

All near-misses, hazards and incidents should be reported immediately via the Seagull Safety Reporting App or, where internet access is not available, directly to Seagull Ops or the Compliance Department.

Annex D – Onboard Routines



Document Title	Annex D – Onboard Routines
Document Ref	SM/OPS/SOP/001-D
ISO Standard	ISO 28007:2015 / ISO 18788:2015 / ISO 28000:2022
ISO Clauses	28007: 4.4 / 18788: A.4.4 / 28000: 8.3 / 45001: 8.1, 8.2
Version	1.0
Classification	Internal
Effective Date	2 April 2026
Review Date	2 April 2027
Approved By	Darren Watts, Group Compliance Director Pavel Shparber, CEO
Supersedes	SMS/SOP/IO/001 Annex D – reformatted and migrated to new referencing system

OVERVIEW

Once embarked and in transit, unless there is an imminent threat or attack, the Seagull Maritime Security Team are expected to maintain consistent routines, follow their assigned duties, conduct training and drills and ensure the security of the vessel throughout the task.

The Team Leader can now implement Standard Operating Procedures for the duration of the transit to ensure that the vessel is protected to the best of the Security Team's ability and to deter and prevent any potential threat.

Standard Operating Procedures should be fluid and suit the situation on board the vessel. The Team Leader should be able to adapt to suit any additional requirements of the Master and the vessel within reasonable parameters of this SOP.

This section of the SOP outlines the duties of the MSO and assigned duties, e.g. Team Leader (TL), expected drills and training and activities/routines to be conducted/followed during the task.

TEAM COMPOSITION

The Team Composition will be of 3 or 4 personnel. The Team Leader will assign the roles of 2iC and Medic.

MARSEC LEVELS

The current internationally recognized maritime security levels – commonly referred to as MARSEC (Maritime Security) levels – provide a scalable framework to indicate the prevailing threat environment and prescribe corresponding protective measures for ships, ports, and marine facilities. These levels are widely used under the International Ship and Port Facility Security (ISPS) Code and other national maritime security frameworks.

Annex D – Onboard Routines



Understanding the current MARSEC level on board is critical to ensure that duties are conversant with the requirements of the security level.

MARSEC LEVEL 1 - Normal	Baseline security level, minimum appropriate protective security measures are always maintained.
MARSEC LEVEL 2 - Heightened	Appropriate additional protective security measures shall be maintained for a period because of a heightened risk of a security incident. This is normally triggered by credible intelligence reporting, updated security advisories, or elevated risk conditions (e.g., reports of nearby attacks or potential piracy, terrorism concerns, or geopolitical instability). Additional reporting, assignment of additional personnel including crew for watch duties and restricting areas of the vessel are additional actions that may be considered.
MARSEC LEVEL 3 - Exceptional	Further specific protective security measures shall be maintained for a limited period when a security incident is probable or imminent, or has occurred, although it may not be possible to identify the specific target. This will be in response to confirmed threats such as imminent attacks, ongoing hostile actions, or credible warnings affecting maritime traffic. All security team members will be active and on-duty in preparedness for taking appropriate actions. Weapons may, with the permission of the Master, be removed from secure storage, but not armed, to be readily available if required.

SECURITY TEAM READINESS LEVELS

Alongside the vessel's MARSEC level status, Seagull Maritime security teams should employ the below readiness states accordingly.

READINESS STATUS (RS) LEVEL 1 - Normal	Standard watch routines are applied. Off duty personnel are available and within 5 minutes of the bridge.
READINESS STATUS (RS) LEVEL 2 - Heightened	Standard watch routines are applied. All off watch team members are awake, alert and in uniform and ready to respond to the bridge within 2 minutes. TL is on bridge for observation and evaluation of the potential threat. If Level 2 is applied, or expected to be applied for long durations, TL is to plan rest breaks accordingly for TM's to ensure all are fit for any potential response required.
READINESS STATUS (RS) LEVEL 3 - Exceptional	Security Team is deployed accordingly to respond to the threat in accordance with Vessel Defence procedures and Rules on the Use of Force.

Annex D – Onboard Routines



DUTIES

The Security Team should establish routine duties for the duration of this transit based on the Applicable Maritime Security Level.

Team duties are set at the basic Level 1 based on a reduced threat. The Team Leader should be ready to adapt duties and respond to the level of threat appropriately. On identification of a threat, Vessel Defence actions and the Rules on the Use of Force are to be followed.

Team Leader (TL) Duties & Responsibilities

- a) Conduct continual risk-assessment toward preserving a non-hazardous environment onboard
- b) Advise and assist the Master with the implementation of vessel hardening measures and provide advice on self-protection measures and best management practice to deter piracy
- c) Advise the Master about the prevailing threat status, tactical use of the vessel and graduated response within the Rules on the Use of Force, ensuring that the Master is fully appraised of the security plan and actions that he will be requested to take during a security incident.
- d) Organise and be part of a watch rotation that maintains 24-hour surveillance of the waters around the client vessels area of operations. The TL should fall in watch with the Master. In the case where the Master does not conduct a watch, the TL is to use his own discretion in setting the watch rotation.
- e) Maintain effective operational communications with the Security Team and Seagull Ops
- f) Post the Emergency Communications Plan at all communications points.
- g) Respond to security incidents in accordance with SOPs and ensure the Security Team employs an effective graduated response to suspicious or hostile vessels
- h) Advise and guide the Security Team with respect to surveillance and response to suspicious or hostile vessels.
- i) Monitor the welfare of the embarked Security Team and report any concerns to the Seagull Ops.
- j) Supervise the coordination of boat transfers between client vessels for the movement of security equipment or personnel.
- k) Provide appropriate guidance to the assist the Master and his crew with the embarkation and disembarkation of security equipment, supplies and personnel when at anchor or alongside in port.
- l) This may include the searching of persons embarking and disembarking the vessel, in accordance with the Master's responsibilities under the ISPS Code.
- m) Be responsible for the operation, calibration, testing, maintenance and defect reporting of any issued equipment.
- n) Complete all required reporting as required by Seagull Ops.
- o) Preserve post-incident evidence if required.
- p) Any other duties as directed by Seagull Ops.

2iC Duties & Responsibilities

Support the TL in his role and responsibilities.

- a) Be prepared to take over TL responsibilities in the event the TL is incapacitated.
- b) When assigned by the TL, lead training or drill activities.
- c) Conduct standard Team Member duties as detailed below.

Annex D – Onboard Routines



NOTE: The 2iC role, as well as being essential to ensuring there is continuation on loss of the TL, is also an opportunity for experienced Team Members to learn and familiarise themselves with TL duties for potential promotion in the future.

Medic Duties & Responsibilities

The assigned Medic, alongside their standard Team Member duties, is responsible for:

- a) Provide first aid on the scene to injured personnel.
- b) Provide lifesaving duties during vessel protection, including use of trauma kits
- c) Make sure the Security Team is familiar with the medical equipment.

Team Member Duties & Responsibilities

- a) Abide by the ship's health & safety and environmental procedures
- b) Understand and abide by Seagull Maritime Security SOPs.
- c) Take direction from the Team Leader and assist the Team Leader in his duties.
- d) Understand verbatim the Rules for the Use of Force.
- e) Follow the duties and activities required as documented within the SOP.

WEAPONS MAINTENANCE & SAFETY CHECK

As soon as it is safe and practicable to do so, and with permission of the Master, the TL shall remove the weapons and equipment from storage and conduct a maintenance and safety check of the weapons with the Security Team.

In a private and safe location, out of view from the ship's crew, where possible, the TL should oversee:

- a) A full weapon strip, clean and lightly oil (if required) of weapons
- b) Full NSPs conducted with the team to ensure competency with the weapon system.
Weapons are unloaded; magazines loaded with ammunition are not to be loaded to the weapons at any time.
- c) Magazines stripped, the springs stretched and lightly oiled (if required).
- d) The ammunition in the magazines checked and cleaned before reloading.
- e) The Medical kit checked and all serviceable.
- f) The remainder of the kit all checked to ensure serviceability.

By carrying out the above it will ensure that the weapons, equipment and magazines are in good working condition. Once these checks have been completed, any issues should be reported to Seagull Ops. The weapons maintenance and safety check should be recorded on the next Daily Report.

No live firing is permitted unless expressly authorised by Seagull Ops.

Magazine Rotation

Each weapon should be allocated three magazines namely A, B, & C - where possible, the magazines should be clearly marked as such.

To ensure for optimum serviceability, the magazines are to be rotated at the end of each transit. By way of example:

Annex D – Onboard Routines



if magazines A & B have been charged and ready for use during a transit, magazine C is to remain empty. At the end of a transit magazine A should be emptied and magazine C charged, and then this rotation continues.

This allows for the ammunition to be properly inspected and the springs in the magazines to be rested over time and not under constant compression.

Transit End

The same process is to be repeated prior to disembarkation. In the event of any item not being in a similar serviceable state as it was at the start of the transit, an additional explanation of the change of condition must be included within the disembarkation report.

Further information and guidance on Weapons & Equipment can be found in the section Weapons & Equipment Management.

WATCH ROUTINES IN TRANSIT

The Team Leader will have established with the Master upon embarkation whether watch routines should be established immediately or upon entrance to a High-Risk Area.

Different factors will dictate the actions of the Master, Officers and Crew when operating inside, and outside, areas of high risk and no document can cover every eventuality. However, the Master will always maintain ultimate responsibility for the safety of the ship, so unless specifically instructed otherwise by the Master, all Security Teams will adhere to standard watch routines as detailed.

If the Team Leader is advised by the Master that a lesser period on either Bridge or Deck watches is requested of the team, he is to inform Seagull Ops immediately and provide detail of the Master's instruction. Ideally the Master should also be requested by the TL to send an email confirmation to Seagull Ops, however it is understood that at times this may not be possible or achievable.

If the Team Leader is in any doubt over a deviation from these instructions the satellite phone should be used to contact Seagull Ops for further advice.

HRA (Standard) Watch Routine

Watch Duties are to be carried out only from Bridge and wings.

- a) Conduct shifts on 4-hour rotation where possible to maximise effectiveness
- b) Be punctual for watch duties, trying to arrive at least 15 minutes in advance.
- c) On Duty personnel should be attired in uniform.
- d) If for any reason, your watch relief is delayed, do not abandon the bridge, seek assistance from the duty officer on the bridge in locating the missing team member. If there is a problem, call the Team Leader or/and team members.
- e) Should your watch be during a scheduled mealtime, coordinate for a temporary replacement to maintain watch for you to take your meal. Do not abandon the bridge without doing so.
- f) When on watch duty, avoid distractions.
- g) Personal phone calls, use of laptops, books etc. will not be tolerated.
- h) On taking over watch duty, check all weapons and equipment are secured and accounted for.

Annex D – Onboard Routines



- i) Be active. Check radar, AIS and 360 ° watches with binoculars or Night Vision every 15 minutes.
- j) Be aware of potential drone activity, look up as well as around you.
- k) Ensure lookouts if deployed are active and aware.
- l) Listen to the radio, take notes of any important events concerning the area of operation.
- m) Keep friendly conversation with the crew to a minimum. Communication is important but the protection of the vessel is the priority.
- n) Report any piracy updates or other important events to the relief, show position in the chart and if possible, ask duty officer to plot chart
- o) In case of suspicious activity, revert to the Rules on the Use of Force Vessel Defence Procedures.
- p) Ensure the superstructure remains locked down
- q) Ensure only essential maintenance is conducted outside the lockdown area
- r) Ensure all countermeasures are in place.
- s) Ensure all positional reporting is being adhered too.

Off Duty Routine

Personnel not on watch shall always be alert and ready for any change in security level or imminent threat.

- a) Rest appropriately when able.
- b) During free time and between shifts, ensure you are within communication reach of the bridge/team member on watch.
- c) Make sure your uniform and PPE is available and ready to use.
- d) Team Members should be able to reach bridge within 5 minutes should an incident occur.
- e) While moving around the vessel, you must comply with all vessel codes of behaviour, dressing standards and Health & Safety requirements.

Outside HRA Watch Routine

Subject to intelligence reporting, it is expected that client vessels can be considered relatively safe from potential attack when outside High-Risk Areas. However, threats may still exist, and risk assessments and intelligence reporting should be considered accordingly.

The TL will already have determined with the Master if the standard watch routine is required either from embarkation to disembarkation of the Security Team or solely on entrance and exit from the High-Risk Area.

A change in MARSEC level may also change this requirement during the task.

Should the Master advise that the standard watch routine is not required, the TL shall instruct the Security Team to follow the Off Duty Routine except:

- a) TL or 2iC to check in to the bridge with the Master or Duty Officer every 4 to 6 hours to assess if any change in routine is required.
- b) Maintain a dialogue with the Master to ensure the appropriate routines are being followed.
- c) Set a routine check on the weapons and equipment until disembarkation.
- d) Keep Seagull Ops advised on Daily Reporting of the watch routine in place.

ADDITIONAL ROUTINES (AS APPLICABLE)

Not all tasks will transit directly from embarkation point to disembarkation point, where deviations to port or other situations occur, the following routines should be applied.

Annex D – Onboard Routines



PORT CALLS

For vessels making port calls, the following guidance should be noted:

- a) On entering port limits, weapons and equipment will be required to be put in secure bonded storage, preventing access by the Security Team, by coastal/port state authorities.
- b) The use of weapons inside port limits is strictly prohibited as the vessel's security is under the port and coastal states authority. To do so may be considered a violation of local or national law and result in the seizing of the vessel and/or the security team by law enforcement.
- c) This does not affect your inherent right to self defence if faced with a potential threat to your life, but any such action should be considered seriously before being taken.

Once the vessel has arrived in port:

- a) Cooperate fully with port officials who may board the vessel. Always employ a patient and cooperative attitude towards port officials.
- b) Where port officials make any requests about weapons and equipment, or any request you consider unreasonable, consult with Seagull Ops immediately.
- c) Unless a Security Team personnel change is to be undertaken, (crew sign off) - you are not to leave the vessel during port operations.
- d) No Team Member is to leave the vessel without the express permission of Seagull Ops and the Master.
- e) Requests to leave the vessel should be emailed to Seagull Ops with clear reasons as to why the request is being made.

In the unlikely event, you should be required to leave the vessel:

- a) Always carry your 'Shore Pass' signed by the Master.
- b) Stay out of restricted areas.
- c) Never take pictures of port areas as most countries see their ports as a strategic facility under tight security. Taking photos of ports and terminals can be interpreted as an act of espionage or criminal offence.
- d) Be aware of your expected duration in port and return to the vessel as soon as possible.
- e) Do not consume alcohol or drugs or engage in any form of entertainment. Fulfil your off-vessel requirements immediately and return to the vessel.

For the avoidance of doubt, personnel should not leave, or request to leave, the vessel unless necessary.

Leaving the vessel without permission will be considered abscondment and will be subject to disciplinary action.

While in port, the Master may request that the Security Team continue to provide security and watch duties to support mandatory ISPS requirements such as:

- a) Preventing stowaways
- b) Preventing armed robbery
- c) (Day and Night - Main deck patrols for deterring access of unauthorized personnel
- d) Watch keeping over the "seaside" of the vessel for boarding attempts

Advise Seagull Ops of the Masters request. Seagull Maritime will agree with the client the specific duties to be conducted by the Security Team and advise the Team Leader. However, as a minimum, the Team Leader should consider and arrange for:

Annex D – Onboard Routines



- a) TM on watch, duration should not be more than 4 hours.
- b) Watch should be carried out from bridge, wings and main deck whilst considering HSE hazards.
- c) If main deck patrols are employed, full PPE should be used.
- d) If TM on watch or any of the Security Team sights a boarding attempt from unauthorised personnel, he should alert the OOW and TL.
- e) TM on watch maintains visual checks that weapons and equipment remain secured.

ENTERING/EXITING A PORT THAT IS WITHIN THE HIGH-RISK AREA

Entering and leaving a port inside a high-risk area is potentially one of the most vulnerable parts of a task. operation

The vessel may be running slow and heavy with heightened maritime traffic around at close range.

Weapons and security equipment will most likely be secured in bonded storage.

The TL should raise the RS level to RS2 and ensure he is on the bridge to be able to respond to any potential threat.

If any threat is detected, report it immediately on VHF Channel 16 to coastal authorities, requesting immediate assistance.

Use all potential measures at hand to deter the threat without the use of the secured weapons.

Reminder: The use of weapons inside port limits is strictly prohibited as the vessel's security is under the port and coastal states authority. To do so may be considered a violation of local or national law and result in the seizing of the vessel and/or the security team by law enforcement.

This does not affect your inherent right to self-defence if faced with a potential threat to your life, but any such action should be considered seriously before being taken.

VESSEL DRIFTING/ANCHORED WITHIN THE HIGH-RISK AREA

Vessels will not, in most circumstances intentionally drift or anchor in high-risk areas without due cause, typically because of vessel breakdown or in some cases, being provided with a change of orders and awaiting new routing details.

Any vessel that does require to drift or anchor while inside a high-risk area is a vulnerable target to attack.

On being advised of the vessel requiring to drift/anchor by the Master, the TL should:

- a) Identify the reasons for drifting/anchoring with the Master
- b) If due to vessel issue, request information on nature of issue, urgency etc
- c) Assess the location where drifting/anchoring will occur and if it is in international or territorial waters
- d) Advise Seagull Ops immediately and request further guidance
- e) Seagull Ops will provide you with risk assessment support and guidance on actions to be taken accordingly based on the location, threat level and intelligence for the area as soon as possible.

Annex D – Onboard Routines



In the interim, and as a minimum:

- a) Advise Master to perform drifting/anchoring in positions as far as possible from skiffs' regular traffic if possible
- b) Once drifting/anchoring, the TL should brief the team on the planned duration the vessel is expected to be in this state
- c) Set a reinforced routine to compensate for the increase in the ship's vulnerability, taking in consideration the expected time of the drifting/anchoring and the security team's fatigue. If a short period of time is expected a 2 man watch routine should be initiated until the vessel is back underway or a detailed procedure is provided from Seagull Ops.
- d) RS Level 2 should be initiated

SHIP TO SHIP (STS) OPERATIONS

Any intended STS operations by the client vessel should be advised in advance to Seagull Ops and the TL.

STS operations should not be arranged or conducted in high-risk areas unless in extreme cases of emergency.

The TL should consult with Seagull Ops immediately on being notified of an STS operation to be conducted and await further advice and guidance.

DRILLS

A piracy drill should be conducted in coordination with the Master and Crew.

When the drill takes place, it is important that all participate.

Ideally, the drill will be conducted before entering the High-Risk Area but can be conducted after, subject to MARSEC level and risk assessment.

If the Master declines to conduct a drill for any reason, this should be recorded and reported on the next daily report to Seagull Ops.

The following is a guide to conducting the drill, not all elements will be available or applicable, and the Master may have additional or alternative requirements that should be considered.

Anti-Piracy Drill Routine (Security Team & Crew)

1) Pre-Drill Briefing

Explain the drill's purpose, scope, and safety boundaries.

All crew, Ship Security Officer (SSO), Security Team, bridge team should participate.

Content:

Overview of current threat level and areas of risk.

Review anti-piracy procedures and roles outlined in the SOP and Ship Security Plan (SSP).

Ensure all crew know the alarm signals for an attack alert and all-clear.

2) Alarm & Communication Check

Initiate the piracy attack alert signal (unannounced, realistic timing).

Annex D – Onboard Routines



Tasks:

Verify internal communication systems (PA, radios).

Practice reporting to maritime authorities (e.g. UKMTO, MSCIO in relevant areas).

At the same time as the drill, the Master may test the Ship Security Alert System (SSAS) – confirm it sends alerts to flag state and company contacts.

3) Watch & Lookout Team Drill

Assign lookouts on bridge and deck.

Practice escalating responses when an unidentified vessel approaches (callouts, distance assessments).

Activate radar, AIS monitoring, and night-vision aids if available; practice how to interpret results.

4) Evasive Manoeuvre Practice

As the vessel will be underway, simulate evasive actions:

Increase to maximum safe speed (a known deterrent).

Alter course and zig-zag patterns as per procedures in risk assessment.

Maintain radio silence except for necessary emergency comms.

5) Safe Muster Point / Citadel Drill

Simulate that boarders are imminent or onboard.

Move non-essential crew to the Safe Muster Point or Citadel (pre-designated secure room).

Lockdown procedures: internal communications only, controlled ventilation if applicable.

Practice internal comms protocols from Citadel to Master/Security Team.

6) Debrief & Review

Conduct a post drill review to:

- a) Identify strengths and deficiencies.
- b) Re-explain procedures that were misunderstood or poorly executed.
- c) Update security plan elements or crew assignments if needed.
- d) Log performance, timings (e.g., how long to secure all access points).
- e) Record the findings for the post-transit report and report the completion of the drill on the next daily report.

Equipment Use & Familiarisation Drill

A non-essential drill but may be useful for newer vessels entering high-risk areas and can be conducted any time:

Equipment: Fire hoses, searchlights, high-pressure water monitors, personal protective gear.

Demonstrate correct setup and safe usage of each item.

Test equipment functionality under simulated stress (low light, noise conditions).

Confirm crew know where to find and how to maintain each item.

Weapons Drills

Further information on conducting weapons drills is found in Weapons & Equipment Management.

Annex D – Onboard Routines



TRAINING

The TL and Security Team are expected to undergo regular training drills on SOP's and RUF during daylight hours of tasks when personnel are available as well as the training conducted in the anti-piracy training drill.

Training shall include:

Weapons Safety Check

As detailed in the Weapons and Maintenance Safety Check procedure in this section.

Tactical Deployment Exercises

Practice RS Level 2 and 3 readiness including deploying to firing positions in event of vessel defence being required. Exercises are weapons free. If all team is to exercise, ensure a temporary watch is stationed on the bridge with the permission and agreement of the Master.

Weapons Dry Drills

If the Master gives permission, weapons can be removed from secure storage for dry drills. TL should identify a safe out of the way location away from crew and work through DRY drills via Normal Safety Procedures with Team Members. This should be a particular priority when new Team Members have not operated regularly with the weapons set to improve familiarisation. Further information on NSP's and weapons safety is featured in Weapons & Equipment Management.

REPORTING & COMMUNICATIONS

Communication with Seagull Ops is essential and paramount to the effectiveness of a transit and its security. The following procedures should be followed by the Team Leader pre-transit, during transit and post-transit.

- a) Team Leader will receive the Task Information from Seagull Ops. This information is to be acknowledged as received and understood on email.
- b) Once the team has embarked on the vessel, Team Leader is to confirm this to Seagull Ops by email and provide an emailed embarkation report within 24 hours.
- c) Daily situation reports are to be sent to Seagull Ops, including any issues, drills held or other activity. A template form is provided however it can be sent in email form provided it follows the required format. The daily report is to be filed at 12:00 UTC.
- d) Security/Situation/Incident reports are to be provided to Seagull Ops as soon as possible using template provided.
- e) Use of Force Report from Rules on Use of Force when applicable.
- f) Weapon Discharge Reports should be filed using template provided.
- g) Health & Safety Near Miss Reports should be filed using the online form if internet access is available otherwise, please report to Seagull Ops on email.
- h) Near-miss, hazard and incident reports can also be submitted via the Seagull Safety Reporting App at report.seagullmaritimeltd.com. Where internet access is not available, report directly to Seagull Ops or the Compliance Department.

Confirmation the team is ready for disembarkation is to be provided to Seagull Ops prior to disembarkation.

Annex D – Onboard Routines



The Post Transit Report and any training/drill reports are to be sent to Seagull Ops a maximum 24 hours following disembarkation along with a disembarkation report.

Vessel Reporting

1. UKMTO Initial report: To advise UKMTO that the vessel is entering the designated piracy area.
2. UKMTO Daily report: Sent once a day or every 4hrs in the IRTC area
3. UKMTO final report: To inform UKMTO of leaving the designated piracy area
4. UKMTO Piracy attack Initial post incident report
5. UKMTO Piracy attack Detailed post incident report
6. MSCIO Registration: Usually completed by CSO to register ship with MSCIO
7. OPS are to be included in the daily report sent to MSCIO/UKMTO

HEALTH & SAFETY

Onboard routines involve ongoing exposure to operational hazards including fatigue, working in hot environments, manual handling of equipment, and weapons handling.

Seagull Maritime has produced Basic Risk Assessment Guides (BRAGs) covering key operational hazards. These are available via the Seagull Safety Reporting App at report.seagullmaritimeltd.com or from Seagull Ops or the Compliance Department.

Full risk assessments and method statements are held by Seagull Maritime and can be requested via the Seagull Safety Reporting App or from Seagull Ops or the Compliance Department.

All near-misses, hazards and incidents should be reported immediately via the Seagull Safety Reporting App or, where internet access is not available, directly to Seagull Ops or the Compliance Department.

Annex E – Vessel Defence



Document Title	Annex E – Vessel Defence
Document Ref	SM/OPS/SOP/001-E
ISO Standard	ISO 28007:2015 / ISO 18788:2015 / ISO 28000:2022
ISO Clauses	28007: 4.4 / 18788: A.4.4, A.9.3 / 28000: 8.3 / 45001: 8.1, 8.2
Version	1.0
Classification	Internal
Effective Date	2 April 2026
Review Date	2 April 2027
Approved By	Darren Watts, Group Compliance Director Pavel Shparber, CEO
Supersedes	SMS/SOP/IO/001 Annex E – reformatted and migrated to new referencing system

OVERVIEW

While in task, there is always potential for the vessel, and you as a security team, to encounter suspicious activity, potential threats and attack from pirates or hostile actors.

This section of the SOP provides a framework for "actions on" encountering the various scenarios possible. No SOP can cover every eventuality, and it will be your responsibility, with appropriate justification, to apply risk-based thinking and, in coordination with the Master of the vessel, to respond accordingly to any threat. However, the following procedures should be followed whenever possible to ensure an appropriate response.

Seagull Ops will make you aware of any deviations or necessary changes to the below actions prior to your embarkation.

All actions on, and the entailing procedures are to be followed in conjunction with our Rules on the Use of Force at all times. Any force used should be proportional, gradual and through following the below procedures, you will prioritise the use of non-violent measures whenever possible. This guidance does not affect your inherent right to self-defence.

All actions must be conducted in accordance with the Voluntary Principles on Security and Human Rights (VPSHR) and the International Code of Conduct for Private Security Service Providers (ICoCA). Personnel are reminded that the protection of human rights is fundamental to all defensive operations.

ACTION ON SIGHTING OF A SUSPICIOUS VESSEL

In the event of sighting a suspicious vessel, the on-watch TM is to:

1. Inform the TL.
2. Inform the officer of the watch (OOW).
3. Conduct radar plot and check CPA.
4. Consult the Seagull Maritime Skiff Identification and Intelligence Aids to assist in verifying the sighting and capture as much detail as possible.

The TL is to:

1. Prepare message including location and details of the vessel/persons/equipment sighted.
2. Ensure message is transmitted firstly to UKMTO by email: watchkeepers@ukmto.org and/or phone: 0044 2392222060 and then, if time permits the IMB by email piracy@icc-ccs.org and/or phone 00 60 3 2031 0014.
3. Ensure message is transmitted to Seagull Ops.
4. Continue to monitor vessel movement.
5. Prepare to move to RS Level 2

ACTION ON INITIAL APPROACH OF A SUSPICIOUS VESSEL

Should the sighting result in an approach from a suspicious vessel, expect the bridge team to:

- a) Conduct radar plot and check CPA.
- b) Prepare 7-line message and MAYDAY.
- c) Start narrative of events

Seagull Team Leader:

- a) Raise readiness level to RS2
- b) Call all other TM's to the bridge, brief and deploy as necessary.
- c) If absent, call the Master to the bridge.
- d) Request the Master to increase speed and alter course to see if suspicious vessel follows. (Following a course alteration the Master should maintain a straight course to sustain maximum speed).
- e) Consider requesting the activating fire hoses or other vessel measures that may be available. If not activated at immediately, request the Master prepare in case needed to do so later in the incident.
- f) Assess the ongoing situation with the Master and ensure the Security Team are in body armour and helmets.
- g) Prepare message including location and details of the vessel/persons/equipment sighted.
- h) Ensure message is transmitted firstly to UKMTO by email: watchkeepers@ukmto.org and/or phone: 0044 2392222060 and then, if time permits the IMB by email piracy@icc-ccs.org and/or phone 0060 3 2031 0014.
- i) Ensure message is transmitted to Seagull Ops.
- j) Continue to monitor the vessel approach accordingly.

ACTION ON ONGOING SUSPICIOUS APPROACH/POTENTIAL ATTACK

Should after a change of direction the suspicious vessel continues to follow, or close on your vessel, and in discussion with the Master, the assessment is made that the vessel is a potential attacker, then expect the following actions are to be taken:

Annex E – Vessel Defence



Bridge:

- a) Bridge watch to announce over the Tannoy / intercom system: 'Security Alert, Security Alert, Security Alert'.
- b) All crew off deck and confirm vessel secured.
- c) Instructions to muster in designated area.
- d) All non-essential personnel cleared off the Bridge and sent to muster area.

Chief Officer or Designated Person:

- a) Ensure ship's handheld radios are switched on.
- b) Consider immobilising internal lifts.
- c) Advise Cook to ensure all gas/electric cookers, grills etc. are turned off before mustering to minimise the fire risk.
- d) Muster all crew in safe area. This is to be a nominated place away from windows such as an internal corridor or crew room but not necessary the citadel. This is to ensure all crew are accounted for and to prepare for further action.
- e) Once the crew have been accounted for, report back to the bridge.

Master

Ensure Piracy 7 LINE message is sent (if time permits) to UKMTO: watchkeepers@ukmto.org

MSCIO: postmaster@mscio.eu

UNAVFOR: opcentre@mschoa.org

IMB: piracy@icc-ccs.org

- a) Steer vessel and consider evasive manoeuvres (port to starboard 5-10 degrees).
- b) Order the activation of any vessel defences, such as fire hoses, as deemed necessary.
- c) Telephone company operations desk (if time permits).

NOTE: Vessel Master and Crew actions may vary to the above subject to vessel, company orders and vessel applicable BMP-MS guidance. The actions above are to no way be deemed as instruction to the Master of the client vessel.

SEAGULL TEAM LEADER:

- a) Request permission from Master to deploy weapons and equipment from storage. Weapons state is WEAPONS **HOLD**.
- b) Maintain readiness Level 2 with expectation to raise to Level 3 where appropriate.
- c) Deploy Security Team Members accordingly as per your operational plan.
- d) Consider and deploy non-violent measures and issue warnings subject to vessel approach distance and in agreement with the Master as per Rules on the Use of Force:

400m: At a range of approximately 400 metres from the vessel, weapons are to be held in plain view by the Seagull Maritime Team Members where and when it is deemed safe to do so. This is to indicate clearly to any potential attackers that the personnel on board are armed.

300m: At approximately 300 metres, the Team Members may fire an aimed volley of approximately 2-3 single warning shots in the vicinity of the incoming skiff(s) (without targeting individual attackers) and remain with their weapons on aim. Shots should be aimed into the water at a safe distance from the incoming vessels to minimise the risk of harm.

Annex E – Vessel Defence



200m: At approximately 200 metres from the vessel the Team Members may seek to disable the attacking craft's engines using all proportionate means, if in their professional judgement they can do so without any undue risk of unintentionally shooting any personnel in the craft.

100m: At approximately 100 metres from the vessel, the Team Members issue a verbal challenge by shouting, "stop or I fire" or words to that effect.

1. TL to assist/advise Master on course of actions available and use of available vessel protection measures.
2. Call UKMTO: +44 2392 222060 and if time, IMB, 00 60 3 2031 0014
3. Call Seagull Ops to report update (if time permits).

ACTIONS ON PIRATE ATTACK, HOSTILE ACT OR HOSTILE INTENT

At this point, the potential attack may be confirmed. There are likely to be a several factors to indicate this:

1. The suspect vessel has followed numerous course changes that you have made.
2. The suspect vessel is on a high-speed course towards you after despite all defensive measures and warning measure having been taken.
3. Weapons, ladders and scaling poles have been sighted and confirmed.
4. The vessel has been or is being fired upon.

The critical decision that must be made by the Team Leader and Master is "do they have hostile intent (following course changes, inbound at high speed) or is a hostile act imminent (weapons sighted, ladders being prepared for boarding)". If the answer is YES then a PIRATE ATTACK is occurring. The following actions on are to be implemented:

Bridge:

- a) Sound the General Alarm (or recognised ship's piracy alarm).
- b) All non-essential personnel off the bridge to the citadel if applicable.
- c) Instruct crew (under Chief Officer) to move to citadel if applicable.
- d) External lighting utilised (as per TL's assessment).

Chief Officer:

- a) Move crew from first muster point to citadel if applicable.
- b) Inform bridge when all crew accounted for.
- c) Ensure all crew sit away from the door.
- d) Commence barricading of citadel door if required.
- e) Monitor incident on CCTV if installed.
- f) Be prepared to facilitate bridge team arrival by way of password.

Master:

- a) Activate Ship's Security Alarm System (SSAS).
- b) MAYDAY VHF 16 (8 for backup if 16 jammed).
- c) Confirm all crew accounted for in citadel by radio or telephone.
- d) Continue to carry out evasive manoeuvres if necessary.
- e) Send SATC piracy message (if time permits).
- f) With the TL, continue to assess situation and react accordingly.
- g) Maintain maximum speed.
- h) Maintain communications with Seagull Ops or the Compliance Department

Annex E – Vessel Defence



NOTE: Vessel Master and Crew actions may vary to the above subject to vessel, company orders and vessel applicable BMP-MS guidance. The actions above are to no way be deemed as instruction to the Master of the client vessel.

SECURITY TEAM LEADER AND SECURITY TEAM:

- a) Ensure all the above actions are being conducted and advise/direct where necessary.
- b) Be prepared to talk to coalition forces on VHF 16 by way of SITREPS.
- c) Liaise closely with the Master reference the escalation of force to include:
- d) Further warning shots in the air.
- e) Shots across the bow/into the water.
- f) Shots into the engine (if a clear opportunity presents itself).
- g) Use of lethal force (See Rules on the Use of Force).
- h) Defend the vessel.
- i) All force used is to remain proportional to the threat faced and escalated accordingly to protect life and defend the vessel.
- j) Then move to the citadel if applicable/defence of the vessel has failed.

Not all shipping companies support this approach. Please refer to Seagull Ops for further guidance if required.

ACTIONS ON MOVING TO THE CITADEL

The citadel door is not to be locked until the Master and the security team are inside

The TL, along with the Master are to make the assessment that if by remaining on the bridge and defending the vessel would further endanger life or if the Master and TL feel they are to be overwhelmed by pirates then they are to make the decision to move to the citadel.

If moving to the citadel, the Master and the bridge watch are to ensure:

- a) Engine controls to STOP and hand control across or as per SSP.
- b) Lights to: "vessel not under command" if at night
- c) Lock bridge wing doors
- d) Lock and block internal bridge door and stairway doors on way to citadel.
- e) Consider extinguishing internal lights on way to citadel (torches required).
- f) Call on radio or use password when arriving at citadel.
- g) Once all inside, barricade/secure door.
- h) Establish watch on VHF and sat phone (if available).
- i) Consider extinguishing all lights in the citadel (torches required).
- j) Remain silent and listen for pirate activity on board.

Security Team is to ensure:

- a) Grab bag with night vision and sat phone.
- b) Weapons box and all spare ammunition taken.
- c) Escort bridge team down to citadel ensuring the way is clear.
- d) Assist in locking and blocking internal doors on way to citadel.
- e) Confirm everyone accounted for and order citadel to be secured.
- f) Place security team in positions to best defend the citadel.
- g) Re-assure crew and maintain silence.
- h) Establish communications with coalition forces by sat phone or VHF radio.
- i) Continuously re-assess the situation with the Master

ACTIONS ON MILITARY ACTION FOLLOWING HOSTILE BOARDING

The following guidelines should be adhered to in case of lockdown in a citadel and awaiting a military response:

- a) Do not use cameras with flash at any time when military action is underway.
- b) All personnel should keep low to the deck, cover their heads with both hands but keep them visible and empty so not to be mistaken as hostile.
- c) Be prepared to answer questions on identity and status aboard.
- d) Be aware that English may not be the working language of all naval units in the region.
- e) Be aware military forces may initially secure all persons encountered until positive identification. This is standard practice. All personnel should be briefed and prepared to expect this and to fully co-operate during the initial stages of military action on board.

NON-PIRACY HOSTILE EVENTS & POTENTIAL ACTIONS

As a partial result of the conflict in Gaza, the Houthi Rebels in Yemen, supported in part by the Iranian Government and their forces, have since November 17th, 2023, initiated an unprecedented airborne attack on the Galaxy Leader and have continued to launch assaults and attacks on commercial shipping primarily transiting the Red Sea and Gulf of Aden but with some incidents occurring further to the east.

These attacks, primarily, according to Houthi statements, were against shipping companies and vessels with links to Israel, a protest by the Houthis and their supporters, against the conflict in Gaza and in support of an Israeli withdrawal or ceasefire.

Attacks are varied and have so far included:

1. Airborne assault and boarding by armed forces (Galaxy Leader).
2. Waterborne approaches by multiple skiffs/vessels requesting vessels change course to Yemen.
3. Waterborne approaches by multiple skiffs/vessels attempting to board and/or boarding and taking command of the vessel.
4. Unmanned aerial devices (UAD'S) or drones armed with explosives aimed at vessels
5. Land based missile launches.

Note: Some waterborne approaches and boardings have been identified (US Navy) as being conducted by Somali nationals that may be considered piracy but there is reason to believe that they are conducted on behalf of the Houthis.

PCASP on board vessels transiting the area are required to be aware of the threats above and note the recommendations of this standing order and the instructions for "action on" detailed within.

ANTI-PIRACY DUTIES

All Team Leaders and Team Members are reminded that they are contracted to their vessel for the provision of the prevention of piracy by Somali pirates. Attacks and or boardings by state actors such identified below are not considered piracy attacks and should be managed in accordance with this section of the SOP alongside existing procedures in this SOP and RUF.

Definition "State Actors"

Coast Guard
National or Government Armed Forces (IRGC, Houthi)

ESCALATION OF FORCE - PRINCIPLE

The key aim if or when presented with an approach or attack that is identified as non-piratical, i.e. not Somali Piracy, and by state actors as defined, is DE-ESCALATION towards the perceived threat.

Our aim is, wherever possible, to reduce the heightened risk to life of the PCASP and crew.

ACTIONS ON HOSTILE ACTS BY STATE ACTORS

Where an approach or attack is:

1. An airborne assault and boarding by armed forces (Galaxy Leader).
2. Waterborne approaches by multiple skiffs/vessels requesting vessels change course to Yemen.
3. Waterborne approaches by multiple skiffs/vessels attempting to board and/or boarding and taking command of the vessel.
4. Unmanned aerial devices (UAD'S) or drones armed with explosives aimed at vessels
5. Land based missile launches.

As per BMP-MS, on board security teams are not to engage with firearms when faced with potential attackers identified as State Actors.

ACTIONS ON AIRBORNE ASSAULT AND BOARDING BY ARMED FORCES

Prevention of such an attack is beyond the ability of PCASP to defend against and de-escalation is the priority. As per BMP-MS, Masters and Client Vessel are advised that security teams are not to attempt to engage state actors with weapons to help avoid escalation.

Where possible:

- a) Secure Seagull weapons and equipment and ammunition in a safe location.
- b) Retreat to the Citadel alongside crew and officers in accordance with the SSP

ACTIONS ON WATERBORNE APPROACHES BY MULTIPLE SKIFFS/VESSELS REQUESTING VESSELS CHANGE COURSE TO YEMEN.

- a) Follow all guidance and recommendation of the Master who will have been advised accordingly on actions by his CSO and as per BMP-MS.
- b) Provide additional "watch" support to the Master and Crew to monitor the approaching vessels.
- c) When an approach becomes an attempted boarding, identify the attackers.

If the attackers identify themselves as state actors, act as appropriate under SOP's and RUF until such time as force may be required, at which point, seek to de-escalate, and do not fire upon attackers.

ACTIONS ON WATERBORNE APPROACHES BY MULTIPLE SKIFFS/VESSELS ATTEMPTING TO BOARD AND/OR BOARDING AND TAKING COMMAND OF THE VESSEL.

- a) Identify the attackers as soon as possible.
- b) Where the attackers can be identified as "pirates", revert to SOP's and RUF accordingly.
- c) If the attackers identify themselves as state actors, act as appropriate under SOP's and RUF until such time as force may be required, at which point, seek to de-escalate, and do not fire upon attackers.

If boarded, follow the SSP and retreat to the citadel alongside the crew, securing the weapons and ammunition where possible.

ACTIONS ON UNMANNED AERIAL VEHICLES (UAV'S) OR DRONES ARMED WITH EXPLOSIVES ATTACK

Where a UAD is identified as approaching:

- a) Sound the alarm to make all aware of the approaching threat.
- b) Retreat to the safest location possible and available on board the vessel.
- c) Where able, attempt single, well aimed shots at the critical components/propulsion of the device when or if safe to do so.
- d) Follow any measures agreed upon embarkation with the Master in line with BMP-MS and Ship Security Procedures.

ACTIONS ON WATER BORNE IMPROVISED EXPLOSIVE DEVICES (WBIED) ATTACK

Where a WBIED is identified as approaching:

- a) Sound the alarm to make all aware of the approaching threat.
- b) Master to co-ordinate with the security Team Leader to attempt to disable/change the course/neutralize the inbound WBIED by:
- c) Identifying the critical propulsion/engine components of the inbound WBIED such as propellor or engine.
- d) Target the components with single well aimed shots at appropriate distance suitable to weapon calibre and sighting systems.
- e) The Master may consider turning the vessel toward the threat (BMP-MS) to help avoid a strike on the engine or steering gear compartments. In such cases, consider the safest and best firing positions.
- f) Should aimed shots fail to neutralize the threat, retreat to the safest location possible and available on board the vessel.
- g) Follow any additional measures agreed upon embarkation with the Master in line with BMP-MS and Ship Security Procedures.

Annex E – Vessel Defence



ACTIONS ON ATTACK BY LAND BASED MISSILE LAUNCHES.

Seagull security personnel do not have the requisite skills or technology to combat such an attack. Where a missile is identified as approaching:

- a) Sound the alarm to make all aware of the approaching threat.
- b) Retreat to the safest location possible and available on board the vessel.
- c) Follow any measures agreed upon embarkation with the Master in line with BMP-MS and Ship Security Procedures.

REMEMBER THE BRACE POSITION IF IMPACT IS EXPECTED: Arms/legs bent, hands holding onto something solid, and feet firmly planted on the deck. (Keeping your mouth open may reduce shock wave damage to the ears.)

HEALTH & SAFETY

Vessel defence situations present significant health and safety risks including exposure to weapons fire, blast injuries, heat stress, and psychological trauma.

Seagull Maritime has produced Basic Risk Assessment Guides (BRAGs) covering key operational hazards. These are available via the Seagull Safety Reporting App at report.seagullmaritimeltd.com or from Seagull Ops or the Compliance Department.

All near-misses, hazards and incidents during or following a defensive engagement should be reported via the Seagull Safety Reporting App or, where internet access is not available, directly to Seagull Ops or the Compliance Department.

Annex F – Incident Management



Document Title	Annex F – Incident Management
Document Ref	SM/OPS/SOP/001-F
ISO Standard	ISO 28007:2015 / ISO 18788:2015 / ISO 28000:2022
ISO Clauses	28007: 4.4 / 18788: A.4.4, A.9.3 / 28000: 8.3 / 45001: 8.1, 8.2, 10.2
Version	1.0
Classification	Internal
Effective Date	2 April 2026
Review Date	2 April 2027
Approved By	Darren Watts, Group Compliance Director Pavel Shparber, CEO
Supersedes	SMS/SOP/IO/001 Annex F – reformatted and migrated to new referencing system

OVERVIEW

The management of incident or crisis on board vessel can be critical to the outcome and post-incident activities. The Team Leader and the Security Team should be capable and competent to deal with most incidents on board vessel with relevant assistance from the Master, Seagull Ops, Seagull Compliance and relevant 3rd parties.

Seagull Maritime investigate all incidents in a transparent and timely manner with the aim of providing a first, initial incident report to our clients within 2 working days.

INCIDENT AND CRISIS

An incident can be defined as: "an instance of something happening, an event or occurrence".

A crisis can be defined as: "an instance or event, that is, or expected to lead to, an unstable and dangerous situation".

The priority is always is to manage incidents to prevent escalation into a crisis.

Seagull Maritime have an Incident and Crisis Management Team available 24/7 daily to assist accordingly as per the company Incident & Crisis Management Plan.

All incidents/crisis on board should be reported as soon as possible to Seagull Ops. Seagull Ops will then follow the Incident and Crisis Management Plan as applicable.

Annex F – Incident Management



TYPES OF INCIDENTS ON BOARD VESSEL

Consider some of the following types of incidents on board a vessel and consider the potential for escalation to a crisis.

- ✓ Attack
- ✓ Suspicious Activity
- ✓ Crime
- ✓ Illness
- ✓ Death
- ✓ Injury
- ✓ Violence
- ✓ Damage
- ✓ Misbehaviour

Example 1

A pirate attack can start as an incident. Using Operating Procedures, applying the Rules on the Use of Force and following procedure can prevent the attack from developing. The attack remains an incident and is reported via normal reporting procedures. However, the potential impact of the incident is failure to repel the attack and the pirates boarding the vessel. This has now escalated to a crisis.

Example 2

A Security Team Member falls ill with a stomach bug. The 4-man team can remain operational using 3 team members. However, the stomach bug then afflicts 2 team members and members of the crew. This is now a crisis as the events have led to the inability to suitably protect the vessel and reduce the threat.

REPORTING OF INCIDENTS

Incident Reporting should be by means of the Incident Report Form. Where this is not possible, email reporting is accepted for initial reporting provided the reporting format is followed.

Where any force has been used, the Use of Force Reporting Form should be used.

Seagull Maritime will always prepare an incident report documenting any incident involving its personnel that involves the use of any weapon, which includes the firing of weapons under any circumstance (except authorized training), any escalation of force, damage to equipment or injury to persons, attacks, criminal acts, traffic accidents, incidents involving other security forces, or such reporting as otherwise required by the Client, and will conduct an internal inquiry in order to determine the following:

- a) Time and location of the incident
- b) Identity and nationality of any persons involved including their addresses and other contact details
- c) Injuries/damage sustained
- d) Circumstances leading up to the incident
- e) Any measures taken by personnel in response to it

Annex F – Incident Management



Crisis Reporting, due to the immediate and potentially dangerous nature of the crisis, should be reported to Seagull Ops by the fastest medium possible, Ship Satellite Phone or the Security Team Satellite Phone.

Once the crisis has been managed and de-escalated, a full situation report should be sent to Seagull Ops.

Incident and near-miss reports can also be submitted via the Seagull Safety Reporting App at report.seagullmaritimeltd.com. Where internet access is not available, report directly to Seagull Ops or the Compliance Department.

METHODS OF COMMUNICATION

- 1) Very High Frequency (VHF) radio (ship to ship ch16)
- 2) Satellite communications
- 3) Digital Selective Calling (DSC)
- 4) Global Maritime Distress Safety System (GMDSS)
- 5) Ship Security Alert System (SSAS)
- 6) Automated Identification System (AIS)
- 7) E-mail

SCENE MANAGEMENT AND PROTECTION OF EVIDENCE

Protection of the Site

A scene for the purpose of forensic evidence gathering is any physical location where evidence may be found. These locations, or scenes, can be a person or a place. Typical examples are:

- 1) The location where the incident took place
- 2) The victim and the potential suspect themselves
- 3) Any location that either the victim or suspect visit immediately or directly after the incident

In all the above circumstances it is imperative to preserve any area or item that may prove to be of evidential value at the earliest possible opportunity.

Scene assessment is a generic system of investigation methods. There are many similarities and common methods to be adopted in investigating all incidents.

Sterility, i.e. protection from contamination or destruction of any scene or item of potential evidential value is a key concern in any crime or incident investigation.

Ideally, a scene log should be commenced and items should be left in situ where found and rooms and public areas should be secured and left for professional forensic examination if practicable.

In the case of a serious incident, implement cordons using barrier tape/or other physical blocks. Obtain details of persons leaving, entering or trying to enter the cordoned area.

Consider the possibility of guarding the scene, but not at the reduction operational capability and only in co-operation and agreement with the Master. The Master may consider the use of crew to guard the scene.

Contact Seagull Ops to obtain further and necessary guidance according to the situational requirements.

Annex F – Incident Management



Creating a Scene Log

Photograph and/or sketch the scene

If you do need to handle items, wear surgical gloves.

Complete a written record of any items removed or recovered from the scene

Ensure continuity/chain of custody of evidence

Details of Injury

Where any injuries are incurred, the full statement of the event should be recorded and reported in both the ships log and the security log, and Seagull OPS are informed.

Damage to the Vessel

Where any damage to the vessel, documented and photographic evidence should be taken and included in the Incident Report.

Statements

The Team Leader will ensure all statements are collected and a copy provided to the Master. Any witness statements should be countersigned on each page and signed by the witness providing the statement.

Firearms and equipment involved in an Incident

Where weapons systems have been used in an incident, the details of the weapons details should be recorded on the Use of Force Report Form.

Weapons should remain stored as per the Weapon Storage States in this Operating Procedure.

Where a firearm has been involved in the cause of harm to self or others, it should be forensically bagged and tagged and stored separately in a clearly marked container. The firearm should not be used any further.

Where a firearm is removed from use, the Team Leader must consider the impact on operational capability for the Security Team and the protection of the vessel.

As in accordance with Msc.1/Circ. 1404, and its guidelines for the recovery and packaging of exhibits, safety takes precedence over evidence collection. Specialist advice must be sought from the Seagull Maritime Incident Manager and Compliance Team before any further action is taken. Failure to seek or comply with advice given is at personnel's own risk. Consideration should always be given for the potential for a criminal investigation to be instigated following any incident.

Annex F – Incident Management



CASUALTY AND EVACUATION MANAGEMENT

The Master has the ultimate authority and responsibility for the decision to treat casualties and for their evacuation required.

ACTIONS ON A MEDICAL INCIDENT

If there is a medical incident with the crew, then the crew are to deal with the casualty. If there is a security team medical incident, then the designated team medic is to deal with the casualty. The Team Leader may treat casualties only within the confines of his certificated training, in general, this will be to the standard of the First Person on Scene - Intermediate qualification.

ACTIONS ON MISSING PERSONS AND MAN OVER-BOARD

Should someone be identified as missing or if they are believed to have fallen over-board, the Master must be informed immediately for the appropriate action to be taken.

ACTIONS ON SECURITY OR CREW PERSONNEL KILLED OR INJURED

Should someone be killed or injured, the Master must be informed immediately for the appropriate action to be taken.

ASSISTANCE TO ADVERSARIES AFTER AN ATTEMPTED ATTACK

All personnel on board ship have a duty of care for all persons at sea under Safety of Life at Sea (SOLAS), to give assistance to vessels or personnel under distress at sea. The below fundamental factors that must be assessed prior to giving any assistance after an attack:

- 1) Are adversaries armed?
- 2) Do adversaries still pose to be a threat?
- 3) Would giving assistance endanger life to personnel or vessel?
- 4) Have authorities being informed and on-route to the position?
- 5) Can assistance be given without disembarking the vessel?

Advice can only be offered to the Master of your vessel in this situation, giving assistance to adversaries that have just attacked your vessel must not endanger your life or the lives of others. If the threat is deemed too high ensure that all authorities have been informed and await their direction.

The Master has the sole authority to permit assistance. The treatment of injury to hostile suspects injured in the course of protecting the vessel is at the decision of the Master.

GENERAL CONDUCT

In accordance with our Human Rights Policy and principles, personnel will treat all persons humanely and with respect for their dignity and privacy and will report any breach of conduct to Seagull Ops immediately.

Personnel are reminded that all conduct must be in accordance with the Voluntary Principles on Security and Human Rights (VPSHR) and the International Code of Conduct for Private Security Service Providers (ICoCA).

Annex F – Incident Management



TRAINING AND DRILLS

Where possible, appropriate and approved by the Master, the Team Leader may organise drills and training exercises for the Security Team on the administering of first aid and casualty management.

Any such training or drill should be noted in a Training Report and submitted by the Team Leader to Seagull Ops on completion of the transit.

DETENTION AND APPREHENSION OF PERSONS

Seagull Maritime personnel will not take or hold any persons except when apprehending persons to defend themselves or others against an imminent threat of violence, or following an attack or crime committed by such persons against company personnel, or against clients or property under their protection, pending the handover of such detained persons to the Competent Authority at the earliest opportunity.

Any such apprehension must be consistent with applicable national or international law and be reported to the Client without delay.

Personnel will treat all apprehended persons humanely and consistent with their status and protections under applicable human rights law or international humanitarian law, including prohibitions on torture or other cruel, inhuman or degrading treatment or punishment.

The Master is the sole authority in relation to the detention and apprehension of persons. Advice can be offered to the Master in relation to the detention or apprehension of persons; however consideration should be given to:

- 1) Suitable location for the detention of persons
- 2) Requirement for guards at the location
- 3) Impact on operational capability

Team Leaders should immediately contact Seagull Ops for further guidance and support following any apprehension of persons.

All actions involving the detention or apprehension of persons must be conducted in accordance with the Voluntary Principles on Security and Human Rights (VPSHR) and the International Code of Conduct for Private Security Service Providers (ICoCA).

IDENTIFICATION AND APPREHENSION OF STOWAWAYS

As with any apprehension of a person, personnel will treat all apprehended persons humanely and consistent with their status and protections under applicable human rights law or international humanitarian law, including prohibitions on torture or other cruel, inhuman or degrading treatment or punishment.

Team Leaders should immediately contact Seagull Ops for further guidance and support on their involvement following any apprehension of stowaways found on board.

We remind all our personnel that any abuses, suspected or otherwise, of any apprehended person and their human rights should be reported immediately, without fear of reprisal or retribution as per our Whistleblowing Policy.

Annex F – Incident Management



HEALTH & SAFETY

Incident management involves exposure to physical and psychological hazards including trauma management, evidence handling, and post-incident stress.

Seagull Maritime has produced Basic Risk Assessment Guides (BRAGs) covering key operational hazards. These are available via the Seagull Safety Reporting App at report.seagullmaritimeltd.com or from Seagull Ops or the Compliance Department.

Full risk assessments and method statements can be requested via the Seagull Safety Reporting App or from Seagull Ops or the Compliance Department.

All near-misses, hazards and incidents should be reported immediately via the Seagull Safety Reporting App or, where internet access is not available, directly to Seagull Ops or the Compliance Department.

Annex G – Weapons & Equipment Management



Document Title	Annex G – Weapons & Equipment Management
Document Ref	SM/OPS/SOP/001-G
ISO Standard	ISO 28007:2015 / ISO 18788:2015 / ISO 28000:2022
ISO Clauses	28007: 4.4 / 18788: A.4.4 / 28000: 8.3 / 45001: 8.1, 8.2
Version	1.0
Classification	Internal
Effective Date	2 April 2026
Review Date	2 April 2027
Approved By	Darren Watts, Group Compliance Director Pavel Shparber, CEO
Supersedes	SMS/SOP/IO/001 Annex G – reformatted and migrated to new referencing system

OVERVIEW

Seagull Maritime are required, in the delivery of security operations in the Indian Ocean Region, to utilise firearms and ammunition.

This section of the SOP provides the procedure and instruction for the safe use, handling, maintenance and storage of firearms, ammunition and specialist equipment by Team Leaders and the Security Team.

During any periods of heightened security, and when transiting High Risk Areas, firearms and ammunition may be issued to the security team. Authorization for the issue of weapons and ammunition is to be given by the Master of the vessel and in accordance with our Rules on the Use of Force.

Only trained personnel are to handle weapons.

LICENSING & CONTROL

Seagull Maritime prioritise compliance and recognise firearms and associated equipment as "controlled goods" that undergo import and export control to operational areas as well as a form of import and export when transiting between RV points. Therefore, we are only enabled to use firearms, ammunition and special equipment only with the appropriate consent and licensing by local and national governments and relevant flag states.

Such consent and licensing is only provided by virtue of the controls and procedures put in place by Seagull Maritime and any instructions related to firearms and equipment must be adhered to by the Team Leader and the Security Team.

Deviation from Seagull Maritime controls and procedures is prohibited and any such deviation may be a disciplinary matter.

Annex G – Weapons & Equipment Management



CARRIAGE OF WEAPONS

To facilitate the proper carriage of weapons, all weapons will be:

1. Licensed and documented to certify proof of weapon ownership and prove the same when transporting weapons through territorial waters
2. Recorded in a company weapons inventory
3. Issued, maintained and stored in accordance with company policy and procedures
4. Carried only by Seagull Maritime vetted and trained Security Operatives
5. No personnel other than Seagull Maritime Security Team Leaders and Team Members are permitted to handle or use Seagull Maritime issued firearms, ammunition and equipment.

TRAINING & COMPETENCY

All Seagull Maritime Security Operatives are to be competent and safe in the handling, use and maintenance of company firearms, ammunition and equipment.

All operatives, prior to deployment, in line with the Recruitment and Training Policy will have successfully completed a Firearms Competency Certification. This consists of dry and live tests to ensure all operatives are competent in:

1. Weapon Handling Drills and Weapon Familiarisation.
2. Rules for the Use of Force.
3. Application of Fire on a full bore 7.62mm Weapon System.
4. International Code of Conduct
5. Weapon Safety on board Vessels.

For Seagull Maritime operatives to remain current and competent in weapon handling procedures throughout deployment periods, the Team Leader will undertake ongoing assessment and continuation training upon embarkation to allow him/her to carry out and assess the dry drills of Team Members.

All training and familiarisation must include:

1. Familiarisation with the weapon system
2. Characteristics
3. Stripping and assembling
4. Magazine filling, load, unload and make safe
5. Stoppage drills
6. Different fire positions
7. Weapon Maintenance and Cleaning Routines
- 8.

This continued periodic training will also consist of refresher training on Rules for the Use of Force.

This allows confirmation of safe and legal use and the safety and the ability of the operative to handle the weapon safely and appropriately.

The Team Leader will record all assessments on each tasking.

Seagull Ops will review all assessment results submitted by Team Leaders.

All Seagull Maritime personnel will re-validate every 12 months on a Firearms Competency Certification Course as per the Firearms Competency Procedure.

Annex G – Weapons & Equipment Management



NORMAL SAFETY PROCEDURES (NSP'S)

NSPs – or Normal Safety Procedures (for Weapons) are the baseline, mandatory safety rules applied at all times when handling, storing, transporting, or maintaining weapons—regardless of operational status or threat level.

As ex-military personnel, it is expected Security Teams are fully familiar with the application of NSP'S. The safe use of firearms is critical and a high degree of self-discipline is essential.

1. Treat Every Weapon as Loaded

Assume a weapon is always live.

Show-clear procedures are mandatory when taking over a weapon or handing over a weapon.

2. Never Point a Weapon at Anything You Do Not Intend to Engage

Muzzle discipline maintained at all times. Weapons muzzles should always remain pointed to the floor and never at another person.

Safe directions of fire are identified, defined and enforced onboard.

3. Keep Finger Off the Trigger

Finger indexed along the frame unless:

1. Positive target identification exists
2. Use of force is lawful, necessary, and authorised

4. Safety Catch is always applied.

A loaded weapon MUST always have its Safety Catch set to the SAFE position when not about to be fired. The position of the Safety Catch should be frequently checked.

5. Know Your Target and What Is Beyond It

Consider:

1. Ship structure
2. Crew locations
3. Fuel tanks, cargo, and critical systems
4. Ricochet and over-penetration risks at sea

6. In Addition

At no time are weapons to be left unattended.

When handing or taking over a weapon, it must be fully unloaded, shown and checked to be safe using show clear procedures.

Weapons clear procedures are to be conducted in a safe location with weapons pointing into the water

Annex G – Weapons & Equipment Management



WEAPONS CLEAR PROCEDURES FOR SEAGULL MARITIME WEAPON TYPES

In the event of a negligent discharge following weapons clearance, follow the negligent discharge procedure found later in this section.

AK/M14 WEAPON TYPES

- ✓ Check weapon safety catch is on
- ✓ Remove magazine
- ✓ Cock the weapon and & Hold
- ✓ Visible check for empty barrel chamber
- ✓ Declare weapon clear
- ✓ Release
- ✓ Aim to safe discharge point (into the water ensuring is clear)
- ✓ Weapon safety to Off
- ✓ Pull trigger to fire
- ✓ Weapon Safety to On



M4/FN WEAPON TYPES

- ✓ Check weapon safety catch is on
- ✓ Remove magazine
- ✓ Cock the weapon and & Hold
- ✓ Visible check for empty barrel chamber
- ✓ Declare weapon clear
- ✓ Release
- ✓ Aim to safe discharge point (into the water ensuring is clear)
- ✓ Weapon safety to Off - Single Shot Mode
- ✓ Pull trigger to fire
- ✓ Weapon Safety to on



Annex G – Weapons & Equipment Management



WEAPON & AMMUNITION MANAGEMENT IN TRANSIT

Storage and Issue of Weapons Systems and Ammunition

The armoury on board the VBA or land-based location subject to embarkation point will issue weapons and ammunition to the Security Team as instructed by Seagull Ops and Standard Operating Procedures.

Once the team is on board the client vessel, the firearms and ammunition must remain under strict control of the Security Team ensuring the Masters approval is sought prior to removal from secure storage and use.

The Team Leader and the Master of the Vessel will mutually agree a safe and secure store for the weapons and ammunition.

Access to the weapons and ammunition will be restricted to the Master and the Team Leader only.

Weapons and ammunition are not required to be removed from their storage location unless there is an identified threat or training and assessment is to take place or without the permission of the Master.

WEAPON STORAGE IN PORT OR TERRITORIAL WATERS

When entering port or the territorial waters of another country, weapons and ammunition natures will be stored, secured and bonded, as required by the Port or Coastal State authorities of the country visited or passing through.

Seagull Ops will provide appropriate guidance ahead of arrival and the Team Leader is responsible for ensuring the necessary actions are completed to ensure safe transit.

Accounting

The Master and Team Leader are responsible for the control and issue of firearms.

The Master/Team Leader is to ensure that firearms and ammunition are secured and locked away when not required.

The Team Leader must advise the Master that:

- a) Weapons/Firearms and ammunition are stored in separate safes
- b) Weapons/Firearms and ammunition are checked daily by quantity
- c) Weapons/Firearms and ammunition are signed for when issued
- d) Ammunition issued for training and operations is accounted for

Weapons and Ammunition Issue

Weapons/Firearms can be issued in International Waters for training with the permission of the Master and Seagull Ops.

When the vessel enters high risk areas within international waters firearms may be issued for duty in accordance with appropriate weapon states as per the Rules on the Use of Force. Individuals are responsible for their weapon/firearm and ammunition when issued.

Annex G – Weapons & Equipment Management



Key Control

The Master and on watch Team Member control keys and access to the secure storage.

The Team Leader is always responsible to the Master for accounting for firearms and ammunition.

Handling of Firearms on board

Firearms should not be carried around the vessel unless posturing as a means of a display of non-violent force and when the appropriate weapons state is confirmed.

Firearms must never be left unattended.

Vessel and Crew Safety

Team Leaders are to ensure that the fire position will not endanger the vessel or crew in any way. All fire positions must be confirmed as safe by the TL.

Safety: Crew must never be permitted to handle firearms.

Arrival at Destination RV Point or Interim Port

All firearms must be unloaded, cleaned and secured in their cases during transfers and ammunition must be packed in a separate (box) container.

All remaining security equipment must also be packed in their pelicase. A list of all security equipment must be prepared for customs (if applicable).

Seagull Ops will advise on specific port or destination related customs and bonding information. If in any doubt, contact Seagull Ops immediately.

EMERGENCY WEAPONS DISPOSAL

Where weapons must be rendered inoperable, concealed or disposed of overboard to prevent seizure by hostile actors or to comply with port state restrictions, the specific process and procedure will be provided by Seagull Ops in real time. The correct action will vary case-by-case and is determined by location and jurisdiction, the operational environment, the weapon's licensing origin (which dictates evidence and accountability requirements), and applicable environmental law – the unauthorised disposal of firearms or ammunition at sea may constitute an environmental violation under MARPOL and under certain flag or coastal state regulations.

Emergency weapons disposal shall only be conducted on the direction of the Master of the client vessel, in coordination with the Team Leader and Seagull Ops. The event shall be fully logged at the time where safely possible and reported through the Seagull Maritime Incident Management process in accordance with Annex F and SM/INT/PRO/006 Incident and Crisis Management Procedure.

USE OF WEAPONS AND AMMUNITION IN TRANSIT

Issued weapons are only to be used:

1. With the express permission of the Master

Annex G – Weapons & Equipment Management



2. On the identification of a threat and in accordance with the Rules on the Use of Force
3. For (dry) training purposes – NO AMMUNITION ISSUED

Use of Weapons and Ammunition in accordance with the Rules on the Use of Force

Weapons should only be discharged in accordance with the Rules on the Use of Force.

Stowage of Weapons and Readiness

As per the Rules on Use of Force, repeated here for emphasis:

Weapons and ammunition will be stowed in weapons cases/bags in a secured cabinet or facility as per this SOP (i.e. Weapons **TIGHT**).

At an appropriate point once the vessel has departed a port and moved beyond national waters (i.e. 12nm), but immediately before entry into the Indian Ocean High Risk Area (HRA), and with the written permission of the Master, weapons and ammunition may be released from storage and issued to the Security Team under the supervision of the Team Leader (i.e. move from Weapons **TIGHT** to Weapons **HOLD**) should there be an identified threat present or for dry drills, maintenance purposes.

If there is no identified threat, weapons should always be at WEAPONS **TIGHT**.

Rules on the Use of Force remain in force for the duration of the tasking.

On exiting high-risk areas, weapons and ammunition are to be in secure stowage (Weapons **TIGHT**).

All weapons, ammunition and specialist items of equipment (i.e. radios and night vision devices) are to be issued and signed for under the supervision of the Team Leader. Once issued, the Team Leader will be accountable for the maintenance of a strict status log of all weapons, ammunition and equipment which must be mustered and accounted for in writing, by named individuals, at least once in every 24-hour period.

The release and re-stowage of weapons and ammunition is to be logged and recorded in writing and signed / countersigned by both the Team Leader and the Master.

Weapons Placement/Firing Positions

There are several options as to the placement of firearms and the selection of fire positions; this will depend on the type and configuration of the vessel and should already have been considered during Vessel Familiarisation.

Safety: There is **NEVER** a requirement to have firearms always made ready; there will be time to 'ready' a weapon in the build up to an attack

Weapons Safety

Weapons should always be assumed to be **LOADED** and must be proved as soon as taken up to ascertain their state

Annex G – Weapons & Equipment Management



Weapons Clear Procedures are to be conducted **EVERY TIME** weapons are issued under the supervision of the Team Leader. (The 2IC should oversee the completion of NSP's by the Team Leader.

Weapons, loaded or unloaded, should **NEVER** be pointed at any person, other than a designated target

Personnel should **NEVER** stand in front of the muzzle of a weapon

Weapons are **ALWAYS** to be handled with care and not be dropped or allowed to fall.

The safe use of firearms is vital, and a high degree of self-discipline is essential. At no time are weapons to be left unattended. When handing or taking over a weapon, it must be fully unloaded, shown and checked to be safe.

Safety Catch: A loaded weapon **MUST** always have its Safety Catch set to the **SAFE** position when not about to be fired. The position of the Safety Catch should be frequently checked.

Weapon States

Weapons are **NOT** to be loaded until ordered and only made ready in accordance with the Rules on the Use of Force.

Weapons should be made safe if there is a delay in firing

<p>Weapons TIGHT</p>	<p>In this state, all weapons and ammunition and associated ancillaries and equipment are securely locked in an appropriate cabinet, locker, container, weapons bag or compartment. Access is strictly subject to the permission of the Master and the Seagull Maritime Team Leader. Magazines should only be de-charged (i.e. emptied of rounds) at the end of a transit. Typical Corresponding Readiness State Level: RS Level 1</p>
<p>Weapons HOLD</p>	<p>In this state, weapons and ammunition are deployed and issued to the respective Seagull Maritime Team Members (see Form 4). Firearms will always be carried in an unloaded state (i.e., no magazine fitted to the weapon and no ammunition loaded into a weapon if no magazine) but any ammunition will be carried either within a magazine or as appropriate on the person of the Seagull Maritime Team Member. Safety-catches are to be applied unless about to fire. (Seagull Maritime do not own any firearms without a safety-catch (e.g., some types of revolvers). Typical Corresponding Readiness State Level: RS Level 2/RS Level 3</p>
<p>Weapons FREE</p>	<p>In this state, authority to fire has been given by the Seagull Maritime Team Leader: the weapons may now be operated within the strict confines of these Rules on the Use of Force (RUF). In this state, all recording devices (e.g. digital recording media, Dictaphones etc) are to be activated. The Seagull Maritime Team Leader should attempt to return to Weapons HOLD as soon as possible after the emergency, whereupon any unloading of any weapon will be supervised by the Seagull Maritime Team Leader. Typical Corresponding Readiness State Level: RS Level 2/RS Level 3</p>

Orders

Clear orders for **OPENING FIRE** must be issued and thoroughly understood by all personnel.

Team Leader issues firing orders as per the Rules on the Use of Force.

Annex G – Weapons & Equipment Management



Weapons Handling

To ensure the essential high degree of safety required during operations, all personnel must be able to always handle their weapons instinctively and correctly.

Any team member deemed non-competent by the TL at any time will not be issued with a weapon and the TL amends his security plans accordingly to suit.

Annex G – Weapons & Equipment Management



ADDITIONAL CONSIDERATIONS - FIREARMS

TACTICAL AWARENESS

It is critical that fire positions and arcs of fire are considered carefully. The most vulnerable and likely locations that attackers will attempt to approach and board the vessel from must be covered. The likely tactical scenarios should also be thought through. Re-enforced fire positions should be constructed. Bridge wings will NOT provide protection alone

Firing Positions

When conducting the vessel security assessment, fire positions are a key consideration. Fire positions should afford the firer as much protection from view and effective fire as possible, on most vessels the bridge wings afford good arcs of fire but are the most obvious fire positions and are close to the bridge. The deck area is the most likely boarding area and should also be considered as a fire position; the following should be considered:

1. Safe clear arcs of fire (muzzle clearance & ricochet possibilities)
2. Drawing fire and endangering crew or hazardous material / cargo
3. Cover for the firer
4. Hazardous cargo
5. Interlocking arcs clear of other personnel
6. Blind spots
7. Communications with the other security team members

Arcs of Fire

Arcs of fire must be interlocking and cover all the areas that it is most likely that attackers will attempt to approach and board the vessel. In particular:

1. Port
2. Starboard
3. Waist
4. Stern

WEAPON MAINTENANCE

Weapon maintenance is essential to keep them in good and safe condition. It is the Team Leader's responsibility to make sure that weapons maintenance is carried out on a regular basis.

The task routine of the security team shall include a check of the weapons and their maintenance state.

If required, weapons are to be stripped, cleaned and lubricated in accordance with the appropriate weapons guidance.

Once all weapons have been cleaned, they are to be returned to the secure storage and sealed and locked.

Additionally, every weapon is to be checked prior to embarkation and prior to disembarking making sure that the weapons are in good condition for their next transit.

Annex G – Weapons & Equipment Management



Weapons Equipment cases are to be kept clean and dry

Ammunition Equipment Cases are to be kept clean and dry

Any faults, errors or further requirements of/for the weapons shall be reported to Seagull Ops without delay.

Weapons maintenance carried out shall be included in the daily report sent to Seagull Ops.

WEAPONS SAFETY CHECK

As soon as it is safe and practicable to do so, and with permission of the Master, the TL shall remove the weapons and equipment from storage and conduct a maintenance and safety check of the weapons with the Security Team.

In a private and safe location, out of view from the ship's crew, where possible, the TL should oversee:

- a) A full weapon strip, clean and lightly oil (if required) of weapons
- b) Full NSPs conducted with the team to ensure competency with the weapon system. Weapons are unloaded; magazines loaded with ammunition are not to be loaded to the weapons at any time.
- c) Magazines stripped, the springs stretched and lightly oiled (if required).
- d) The ammunition in the magazines checked and cleaned before reloading.
- e) The Medical kit checked and all serviceable.
- f) The remainder of the kit all checked to ensure serviceability.

By carrying out the above it will ensure that the weapons, equipment and magazines are in good working condition. Once these checks have been completed, any issues should be reported to Seagull Ops. The weapons maintenance and safety check should be recorded on the next Daily Report.

No live firing is permitted unless expressly authorised by Seagull Ops.

Magazine rotation

Each weapon should be allocated three magazines namely A, B, & C - where possible, the magazines should be clearly marked as such.

To ensure for optimum serviceability, the magazines are to be rotated at the end of each transit. By way of example:

if magazines A & B have been charged and ready for use during a transit, magazine C is to remain empty. At the end of a transit magazine A should be emptied and magazine C charged, and then this rotation continues.

This allows for the ammunition to be properly inspected and the springs in the magazines to be rested over time and not under constant compression.

Transit End

The same process is to be repeated prior to disembarkation if possible. In the event of any item not being in a similar serviceable state as it was at the start of the transit, an additional explanation of the change of condition must be included within the disembarkation report.

Annex G – Weapons & Equipment Management



NON-ESSENTIAL FIRING OF WEAPONS

It is Seagull Maritime policy that weapons are not to be test fired while on board client vessels.

Due to limitations in shore-based facilities it is not possible to conduct weapon training prior to boarding vessels, therefore any test firing or zeroing of weapons if required is **ONLY** conducted on board approved Vessel Based Armouries.

Firearms **SHOULD** be mechanically tested prior to operational use.

This should be carried out as discreetly as possible either at first light or dusk when there is minimal crew around to reduce the risk of injury in the event of negligent discharge.

The Master and watch officer must be informed of the procedure, weapons signed out in accordance with this SOP and all safety procedures followed.

NEGLIGENT/ACCIDENTAL DISCHARGE

Seagull Maritime have established the necessary controls and procedures to ensure competency and safety in all operatives when handling firearms and ammunition. However, in the event of a failure of these controls, the following procedure applies:

- a) The operative responsible is removed from operational capability
- b) Weapon issue is revoked
- c) An immediate incident report is filed with Seagull Ops.
- d) A weapon discharge report is recorded and sent to Seagull Ops.
- e) Senior Operations Manager to conduct an incident investigation as soon as possible.
- f) Operative responsible is required to immediately renew his Firearms Competency Certificate before operational availability is renewed

All negligent or accidental discharges must also be reported as a health and safety incident via the Seagull Safety Reporting App at report.seagullmaritimeltd.com or directly to Seagull Ops or the Compliance Department.

Annex G – Weapons & Equipment Management



WEAPON FAILURE

Where a weapon fails or there is an issue when firing the weapon, such as:

1. Round fails to load
2. Round becomes fixed in the chamber or barrel
3. Magazine fails to attach
4. The weapon should immediately be removed from use.

DO NOT ATTEMPT TO REPAIR THE WEAPON OR MANUALLY REMOVE ANY ROUND THAT HAS BECOME LODGED IN THE WEAPON.

- a) Seal the weapon in an individual pelicase and clearly label the case as holding a faulty weapon.
- b) Advise Seagull Ops immediately of the faulty weapon and request that the disembarking agent be made aware of the faulty weapon.
- c) Restrict all access to the faulty weapon and the weapons case is to remain sealed until the weapon can be handed over to an approved armourer.
- d) When in doubt, consult with Seagull Ops immediately.

The TL should adjust operational planning in the event of vessel defence accordingly to account for the loss of a weapon.

AMMUNITION MANAGEMENT & MAINTENANCE

All weapons are issued specific ammunition amounts per weapon for each individual transit.

Management

Ammunition is to be checked and counted prior to embarkation, following embarkation, prior to disembarkation and on disembarkation prior to the ammunition being put into the respective armoury.

The ammunition count should be:

1. Per round and not per box/container
2. Inventoried against the submitted documents supplied by Seagull Ops.
3. Each box physically inspected for the correct amount of rounds
4. Ammunition is to be physically inspected for degradation/suitability for use

Where ammunition is identified as degraded/unsuitable for use prior to embarkation, it should be removed from the equipment boxes and Operations advised. Where ammunition has been rejected, all documentation and inventories are to be updated and emailed to Seagull Ops as soon as possible.

Ammunition Use

When allocating ammunition for magazine charging, ammunition should be physically inspected and ammunition that is identified as nearing the end of its useful life, should be utilised for firing first to assist in ensuring as many rounds as possible are in good condition for the future and not wasted needlessly.

Annex G – Weapons & Equipment Management



Ammunition Maintenance

While ammunition cannot be "maintained" in the traditional sense, all ammunition is to be regularly inspected and checked for rusting, degradation and dampness in their containers. Excess moisture should be cleared from the ammunition and where possible and applicable, ammunition should be cleaned and dried before returning to storage.

EQUIPMENT

Seagull Maritime will provide Equipment Boxes for use by the Security Teams. The Team Leader is responsible for ensuring the equipment provided is serviceable and functions correctly.

- Combat Body Armour
- Ballistic helmet
- Medical Kit
- VHF/UHF Comms (selected tasks)
- One Pelican Case to include:
 - Binoculars
 - Weapons Cam
 - NVAs
 - Satellite Phone and Charger

Weapon and Equipment Instruction Manuals and appropriate usage instructions should be supplied to the Team Leader within the Team Leader Information Pack.

Satellite Phones

Satellite phones are issued to teams for operational usage only. Personal calls are unacceptable usage which, use up expensive and valuable credit which may be required in operational emergencies.

As Team Leader you are responsible for briefing your Team on what is acceptable and unacceptable usage.

Any unjustified use of satellite phones may be deducted from individual operative invoices and will also be classed as misconduct by Seagull Maritime and may impact the future contracting of the services of the operative(s) responsible for the excessive and/or unacceptable use.

Seagull Maritime treats bridge communications the same as Satellite phone usage. Unless under extreme emergency situations, and with the permission of the Master, NO personal calls shall be made using Bridge communications.

Body Armour and Helmets

Body Armour and Helmets are controlled, military grade equipment and are not to be transferred to non-Seagull Maritime personnel under the terms of the Company's export and trade licence requirements.

Failure to comply may and can be considered a disciplinary matter.

Body Armour is NOT to be worn during the embarkation or disembarkation of a vessel or platform.

Annex G – Weapons & Equipment Management



Weapon Cameras

The use of Weapon Cameras, if available, are for the recording of essential footage for the investigation of any incident on board the vessel when issued.

Personal recording devices such as mobile phones or Go Pros are not permitted. Any footage captured by weapon cameras, or personal recording devices is the property of Seagull Maritime, whether the camera is issued by Seagull or a personal device, and is **CONTROLLED** and **COMPANY CONFIDENTIAL**.

The unauthorised copying, distribution or use of this footage is a disciplinary offence.

Medical Kits

Referencing the Maritime Labour Convention, 2006, (MLC, 2006) which establishes standards for medical care on board ship and ashore, and considering the World Health Organisation's (WHO) Quantification Addendum: International Medical Guide for Ships, 3rd Edition that specifically addresses:

Ship's Medicine Chest: the kinds and amounts of medicines, medical supplies and equipment that should be considered for a ship's medicine chest, and requirements for their re-supply, replacement and disposal.

Also, considering the training requirements defined by Seagull Maritime and the medical training provided to PCASP before embarkation, it has been assessed that Seagull Maritime will only provide a trauma kit to Team Leaders, as sufficient other medical supplies and equipment should be available on-board as laid down in the WHO's Table 1 (Recommended Quantities of Medicines for Ships Without a Doctor On Board), as per Category A: Oceangoing Ships.

However, a trauma kit will be issued to all Team Leaders, and it will be the responsibility of Team Leader to ensure that this kit is maintained. There are certain items that have an expiry date within the trauma kits and the Team Leader is to advise Seagull Ops six months ahead of this date requesting re-supply as required. If a replenishment request has not been received in good time from the Team Leader, Seagull Ops should use their master list (of expiry dates for all date critical supplies in the trauma kits) and send a reminder to the Team Leader.

Uniform

Seagull Maritime issued Uniform, namely polo shirts bearing the company logo and name are for the use of the Operative they are issued to **ONLY**.

Operatives are prohibited from loaning or gifting Seagull Maritime equipment or uniform to non-Seagull Maritime personnel.

Operatives are required to sign for all issued uniform and return any unused or unwanted uniform to the Seagull Operations Department whenever applicable as per the company's Uniform Policy. Failure to comply with the Uniform Policy may be a disciplinary offence.

Where uniform has become degraded and is no longer suitable for use, operatives are to remove the company Logo from the chest of the polo shirt and return to Seagull Ops or the VBA Manager before any further polo shirts can be issued.

Annex G – Weapons & Equipment Management



HEALTH & SAFETY

Weapons and equipment handling presents significant health and safety risks including negligent discharge, manual handling injuries, hearing damage, and chemical exposure from cleaning agents.

Seagull Maritime has produced Basic Risk Assessment Guides (BRAGs) covering key operational hazards including weapons handling and manual handling. These are available via the Seagull Safety Reporting App at report.seagullmaritimeltd.com or from Seagull Ops or the Compliance Department.

Full risk assessments and method statements can be requested via the Seagull Safety Reporting App or from Seagull Ops or the Compliance Department.

All near-misses, hazards and incidents should be reported immediately via the Seagull Safety Reporting App or, where internet access is not available, directly to Seagull Ops or the Compliance Department.

Annex H – Disembarkation & Post Transit



Document Title	Annex H – Disembarkation & Post Transit
Document Ref	SM/OPS/SOP/001-H
ISO Standard	ISO 28007:2015 / ISO 18788:2015 / ISO 28000:2022
ISO Clauses	28007: 4.4 / 18788: A.4.4 / 28000: 8.3 / 45001: 8.1
Version	1.0
Classification	Internal
Effective Date	2 April 2026
Review Date	2 April 2027
Approved By	Darren Watts, Group Compliance Director Pavel Shparber, CEO
Supersedes	SMS/SOP/IO/001 Annex H – reformatted and migrated to new referencing system

OVERVIEW

Security teams will disembark to either a vessel-based armoury (VBA) or port from the client vessel.

Personnel should refer to the Seagull Maritime Deployment Procedure Document for relevant information on uniform, equipment and documentation requirements.

This section of the SOP will provide the guidance and procedures to be followed for disembarkation from the client vessel and post transit responsibilities.

DISEMBARKATION PROCEDURE - VBA

The Team Leader is responsible for the safe disembarkation of his TM's and all equipment from the client vessel.

Seagull Ops will provide the relevant disembarkation procedures for the location.

Where disembarkation is delayed for legitimate safety reasons – including adverse weather, sea state, or equipment issues – this shall be communicated to the client vessel's Master and Seagull Ops immediately. Personnel safety takes absolute priority over operational schedules and no transfer shall proceed unless conditions are assessed as safe.

The Team Leader will advise Seagull Ops prior to disembarkation that all preparations to disembark are complete and the team is ready to disembark.

Health & Safety

Life-saving equipment, life jackets and protective equipment such as hard hats will be supplied and are to be always worn.

Annex H – Disembarkation & Post Transit



If suitable safety equipment is not available, the Team Leader is to report this to Seagull Ops at the earliest opportunity.

If at any point during the disembarkation process conditions are assessed as unsafe – including but not limited to adverse weather, sea state, inadequate safety equipment, or equipment failure – the Team Leader has the authority and the duty to suspend or abort the transfer. Any stop-work decision shall be reported to Seagull Ops immediately and recorded in the post-task report.

Team Leader is to ensure that under no circumstances must the team members embark the vessel with cigarette lighters on their person or any other form of device which produces a naked flame, these are prohibited items.

Suitable protective footwear and clothing are to be always worn through the disembarkation process.

Body armour is not to be worn and should be secured in the Equipment Boxes.

All mobile phones and other electrical devices are to be switched OFF and not switched on again until safely on board the VBA or ashore.

If Ship to Ship (STS) disembarkation is required, contact Seagull Ops immediately for additional procedures and requirements.

Risk Assessments and Safety Guidance

A Health and Safety Risk Assessment (SM/HSE/RA/002) has been completed for vessel transfer operations. The full risk assessment is available on request from Seagull Ops or the Compliance Department. A method statement for this activity is also available and should be reviewed prior to any transfer. Method statements can be accessed or requested via the Seagull Safety Reporting App at report.seagullmaritimeltd.com.

A Basic Risk Assessment Guide (BRAG) for vessel transfer operations is issued with this SOP as a quick-reference safety guide. BRAGs are also available via the Documents Library on the Seagull Safety Reporting App at report.seagullmaritimeltd.com. The BRAG is written in plain language and summarises the key hazards, controls and actions for this activity. Team Leaders should ensure all team members have read and understood the BRAG before the transfer takes place.

Reporting Unsafe Conditions and Near Misses

All personnel have a duty to report any unsafe condition, near miss, incident or injury – no matter how minor. Reports can be submitted at any time using the Seagull Safety Reporting App at report.seagullmaritimeltd.com. The app is accessible from any device with an internet connection. Reporting is confidential and no person will be penalised for raising a genuine safety concern.

In the event of a serious injury or dangerous occurrence, the Team Leader must report to Seagull Ops immediately by phone in addition to submitting a report via the app.

Leaving the Vessel

Typically, the security team will be transported from the client vessel by RHIB or a small crewing vessel (transfer vessel).

Annex H – Disembarkation & Post Transit



The transfer vessel will be in direct communication with the client's vessel and will arrange the disembarkation at a prearranged RV point.

Once alongside the client vessel, the coxswain and transfer vessel team will prepare for the transfer of the personnel and equipment.

Appropriate protective equipment, e.g. helmets and lifejackets will be provided.

In exceptional circumstances, if it is in the opinion of the Team Leader there is insufficient Life Saving Equipment, appliances or any other safety concerns that could pose a threat to the safe transfer of the team, the Team Leader is to refuse disembarkation and inform Seagull Operations immediately by phone.

Weapons and equipment will be transferred to the transfer vessel under the supervision of the Team Leader by the vessel crew.

Weapons and equipment are to be prepared for transfer by the transfer vessel team and in coordination with the client vessel's Master. Security personnel are NOT to be involved in securing the equipment to load lines, cranes or other equipment used for transfer.

The Team Leader is responsible for ensuring all weapons and equipment has been transferred.

Personnel will disembark from a pilot ladder. In poor weather or extreme conditions, alternative methods may be used such as a crane.

The Team Leader will decide the disembarkation order of the Security Team.

After boarding the transfer vessel, the team must always follow the coxswain's and vessel crew's instructions.

Additional Notes:

Personnel are to ensure personal belongings are secured and of a suitable weight for transfer.

The carriage of excess weight or additional, non-essential personal items is prohibited unless agreed in advance with the VBA Vessel Manager or port agent and the client vessel.

Passports and important documents should be sealed in bags or suitable waterproof protection and secured against the body.

Personnel are to never secure themselves to weapons and equipment boxes during a transfer.

DISEMBARKATION DOCUMENTATION AND REPORTING

On completion of the disembarkation procedure and the Security Team are safely on the VBA or the land base, the following documentation and procedures are to be completed:

Disembarkation Confirmation

E-mail confirmation to Seagull Ops that the Security Team has disembarked and has arrived on land or the platform.

Seagull Ops may advise on the next deployment or arrangements for the Security Team at this point.

Annex H – Disembarkation & Post Transit



Post Transit Report

The Team Leader is to complete and return the Post Transit Report Template to Seagull Ops.

In addition, copies of any Incident Reports, Training Reports, Use of Force Reports and Weapon Discharge Reports should also be attached. Regardless of whether an incident has occurred or force has been used, reports should be submitted as confirmation of compliance.

In addition to completing the Post Transit Report, the Team Leader should ensure that any near misses, unsafe conditions, incidents or injuries that occurred during the transit have been reported via the Seagull Safety Reporting App at report.seagullmaritimeltd.com. Where internet access is not available, reports should be submitted as soon as connectivity is restored.

Team Member Assessment Forms

The Team Leader is to complete and return the Team Member Assessment Reports for each Team Member.

ANY EXPECTED OR INCURRED DELAY IN THE SUBMISSION OF POST-TRANSIT MANAGEMENT DOCUMENTATION SHOULD BE ADVISED TO SEAGULL OPS AS SOON AS POSSIBLE.