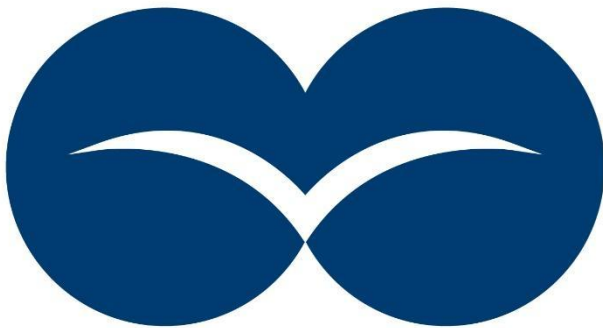


# STANDARD OPERATING PROCEDURES - WEST AFRICA SEV

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**SEAGULL**  
M A R I T I M E

**Document Name:** STANDARD OPERATING PROCEDURES - WEST AFRICA SEV  
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## STANDARD OPERATING PROCEDURES

### INTRODUCTION

This Standard Operating Procedure (SOP) serves as the guidance and rules for all Seagull Maritime Operations in West Africa providing Armed Security Escort Vessels manned by National Government Armed Forces.

The West Africa Operations Team principal objective is to provide close protection to international merchant vessels when operating within the Gulf of Guinea and the Economic Exclusion Zones of the littoral states, keeping client vessels and their crews safe from piracy and other acts of aggression.

This SOP together with Seagull Maritime's connected policies, is designed to provide the best possible protection from all know threats in the Area of Operations in the wider Gulf of Guinea region prioritising human life and safety and reducing the risk to client vessels as well as protecting the interests of our stakeholders, personnel and the local communities involved.

It is the responsibility of Seagull Maritime West Africa Ops and its designated personnel and staff to ensure the best possible risk mitigation is in place when supporting client vessels.

Standard Operating Procedures are issued to all personnel.

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 armed SEV's and local naval teams to protect client vessels in the West Africa Region (Gulf Of Guinea)

The procedures in this document do not restrict or limit in any way the on-scene security personnel from reacting immediately to any imminent threat in a fashion that is not described. This is also extended to the actions of the Armed SEV's crew and especially the Master under any extraordinary circumstances they may encounter.

This SOP is produced for operation activity in a very dynamic environment, and all procedures are live which can mean that active adaptation may be required due to a change in the immediate security environment of the Gulf of Guinea. It is advised and strongly encouraged that feedback is given on a regular basis for recommended amendments so that management can review and adopt as required.

### SCOPE

# SOP – WEST AFRICA SEV



All operational aspects and maritime security requirements for the deployment and use of Armed SEV's for the safeguarding of client vessels and their crew in the West Africa region.

**NOTE: Due to restrictions in the West Africa region, this SOP does not allow for the embarkation of armed personnel contracted as Privately Contracted Armed Security Personnel (PCASP) on board client vessels.**

## RESPONSIBILITIES

Responsibilities are as assigned within this SOP.

It is the responsibility of the West Africa Operations Director to ensure he and all his staff have read and understood this SOP.

Where staff or personnel are uncertain or unaware of any relevant information, referred to, or within this SOP the West Africa Operations Director 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.

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

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

NOTE: Naval teams and personnel will be referenced to this Standard Operating Procedure, however, as they are governmental forces operating within their own territorial waters, they are subject to their own policies and principles, and Seagull Maritime take no legal or ethical responsibility for any potential actions taken by said forces outside of this SOP.

## LEGALITIES AND REFERRING DOCUMENTATION

This SOP has been written in accordance with all applicable flag state guidance, IMO circulars and direct references from BMP-MS (Best Management Practices – Maritime Security).

Seagull Maritime operates a:

- ✓ Quality Management System to ISO 9001:2015,
- ✓ Security Management System to ISO 280000:2022
- ✓ 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.

# SOP – WEST AFRICA SEV



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.

The Seagull Maritime Compliance Department monitors all external references and standards relating to the provision of risk management services 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 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.

Seagull Maritime is committed to the Voluntary Principles on Security and Human Rights (VPSHR) and operates as a signatory to the International Code of Conduct for Private Security Service Providers (ICoC). All Armed SEV operations must be conducted in full compliance with these frameworks. Particular attention must be given to the conduct of Host Nation Force (HNF) personnel embarked on SEVs, and any concerns regarding human rights violations must be reported immediately through the incident management process.

Additional sources considered in this SOP have been obtained from:

- National Security Council
- Joint War Committee
- International Maritime Bureau
- Office of Naval Intelligence (USN)
- INTERTANKO
- OCIMF
- BIMCO
- International Chamber of Commerce
- MDAT GOG
- Various Industry Guidelines

## DEFINITIONS & ABBREVIATIONS

|                      |  |
|----------------------|--|
| <b>AO</b>            | AREA OF OPERATIONS   |
| <b>ARMED SEV</b>     | ARMED SECURITY ESCORT VESSEL   |
| <b>BIMCO</b>         | BALTIC AND INTERNATIONAL MARITIME COUNCIL                                |
| <b>BMP - WAF</b>     | BEST MANAGEMENT PRACTICES FOR VESSELS CALLING AND TRADING IN WEST AFRICA |
| <b>BOP</b>           | BREAK OFF POSITION   |
| <b>CD</b>            | COMMERCIAL DEPARTMENT  |
| <b>CRESMAC</b>       | CENTRE OF REGIONAL MARITIME SURVEILLANCE FOR CENTRAL AFRICA              |
| <b>CREMAO</b>        | CENTRE OF REGIONAL MARITIME SURVEILLANCE FOR WEST AFRICA                 |
| <b>CLIENT VESSEL</b> | CLIENT VESSEL  |
| <b>ETA</b>           | ESTIMATED TIME OF ARRIVAL  |
| <b>ETB</b>           | ESTIMATED TIME OF BERTHING   |
| <b>ETC</b>           | ESTIMATED TIME OF COMPLETION   |
| <b>ETD</b>           | ESTIMATED TIME OF DEPARTURE  |
| <b>ETS</b>           | ESTIMATED TIME OF SAILING  |
| <b>FEDGOV</b>        | FEDERAL GOVERNMENT OF NIGERIA  |
| <b>GOG</b>           | GULF OF GUINEA   |
| <b>ICC</b>           | INTER-REGIONAL COOPERATION CENTRE  |
| <b>ICOC</b>          | INTERNATIONAL CODE OF CONDUCT  |
| <b>IMO</b>           | INTERNATIONAL MARITIME ORGANISATION                                      |

# SOP – WEST AFRICA SEV



|                 |   |
|-----------------|---|
| <b>IMS</b>      | INTEGRATED MANAGEMENT SYSTEM                            |
| <b>ISPS</b>     | INTERNATIONAL SHIP AND PORT FACILITY SECURITY CODE      |
| <b>SEAGULL</b>  | MARITIME RISK SERVICES                                  |
| <b>MDA</b>      | MARITIME DOMAIN AWARENESS                               |
| <b>MDAT GOG</b> | MARITIME DOMAIN AWARENESS FOR TRADE GULF OF GUINEA      |
| <b>MSLO</b>     | MARITIME SECURITY LIAISON OFFICER                       |
| <b>NIMASA</b>   | NIGERIAN MARITIME SAFETY AGENCY                         |
| <b>NN</b>       | NIGERIAN NAVY   |
| <b>NNT</b>      | NIGERIAN NAVY TEAM                                      |
| <b>OCIMF</b>    | OIL COMPANIES INTERNATIONAL MARINE FORUM                |
| <b>OP/OPS</b>   | OPERATIONS  |
| <b>PMSC</b>     | PRIVATE MARITIME SECURITY COMPANY                       |
| <b>RVP</b>      | RENDEZ VOUS POSITION                                    |
| <b>SOLAS</b>    | SAFETY OF LIFE AT SEA (INTERNATIONAL CONVENTION)        |
| <b>SOP</b>      | STANDARD OPERATING PROCEDURE                            |
| <b>STBY</b>     | STAND BY  |
| <b>SUA</b>      | SUPPRESSION OF UNLAWFUL ACTS (INTERNATIONAL CONVENTION) |
| <b>UNCLOS</b>   | UNITED NATIONS CONVENTION ON THE LAW OF THE SEAS        |
| <b>VPSHR</b>    | VOLUNTARY PRINCIPLES OF SECURITY AND HUMAN RIGHTS       |
| <b>WAF</b>      | WEST AFRICA   |
| <b>EEZ</b>      | EXCLUSIVE ECONOMIC ZONE                                 |

## COMPANY POLICY

# SOP – WEST AFRICA SEV



All Seagull Maritime employees, contractors, vendors and affiliates are required to comply our management system policies. These policies are testament to the company's high standards of quality service and business ethics combined with strict conformity with all laws and regulations that govern our day-to-day activities and conducting security operations.

Policies are briefed and explained in full during staff and personnel's induction training and annual refresher training or ad-hoc training when significant policy change is made.

Policies are readily available in hard and soft copies to all stakeholders.

Our company code of conduct summarizes our key policies and lays out the ethical standards that apply to all our staff and external partners and stakeholders.

Seagull Maritime has the reasonable expectation that all employees, personnel, contractors, vendors or any other individual or entity that has a business association with Seagull Maritime will agree to, and abide by, this code and in doing so, act with integrity, honesty transparency and compassion.

Key policies are:

- ✓ Security Operations & Security Policy
- ✓ Equal Opportunities Policy
- ✓ Quality Policy
- ✓ Human Rights Policy
- ✓ Anti-Bribery, Corruption & Business Ethics Policy
- ✓ Grievance & Whistleblowing Policy
- ✓ Environment Policy
- ✓ Health & Safety Policy
- ✓ Drug & Alcohol Policy

## ARMED SEV OPERATIONAL PROCEDURES

### CHAIN OF COMMAND

Seagull Maritime Operations Management are the senior point of the chain of command for these procedures and should be contacted immediately on any occasion that exceeds the norm or if there is any misunderstanding or identification of issue with any of this SOP.

During an Armed Sev Escort Security Operation the following chain of command exists:

1. WAF Operations Director
2. Operations Manager / or another designated person
3. Master of the Armed SEV
4. Naval Team Leader on board

Where a Maritime Security Liaison Officer (MSLO) is requested to be deployed, their role and responsibilities are as defined in Appendix A: MSLO Roles & Responsibilities.

**This chain of command is for the purposes of this SOP only and does not affect or override the Master of the Armed SEV's overriding authority on board the vessel.**

### Armed Response

Should a threat be detected during the security operation, the local forces Team Leader on board has the authority to implement their Naval Operating Procedures and Rules of Engagement.

### MASTERS OVERRIDING AUTHORITY

The Master of the assigned Armed SEV has overriding authority to keep the crew and vessel safe from any harm.

As such, the Master remains the sole responsible person on board for the safety of all including the vessel and is obliged to follow Seagull's policies and procedures, national and international law and all maritime conventions in place.

The vessel remains under the control of the Master at all times.

If an MSLO is deployed, he must be aware of the Masters overriding authority, which does not affect an individual's right to self-defence.

Seagull Maritime Ops (or the deployed MSLO) must be aware of the ship's alternative chain of command should the Master become incapacitated or unavailable.

This SOP recognises ISPS Code Part B 4.10 which states that at all times the Master has the ultimate responsibility for the safety and security of the ship. Even at Security Level 3, a Master may seek clarification or amendment of

instructions issued by those responding to a security incident, or threat thereof, if there are reasons to believe that compliance with any instruction may compromise the safety of the ship.

## **RISK MANAGEMENT & ASSESSMENT**

It is accepted under this SOP that Seagull Maritime's client has undertaken their own security and risk analysis that has led to the contracting of a Seagull Maritime Armed SEV deployment.

Seagull Maritime, via our partner Vanguard Tech, produces an individual voyage risk assessment (VRA) for each operation undertaken. The VRA is based on a specific methodology, live intelligence and threat analysis that allows for continual review and provides flexibility to adapt to the dynamic and ever-changing environment we operate in.

Factors considered during risk assessment will include, but are not limited to, the following:

- ✓ Crew Composition
- ✓ Crew experience
- ✓ Vessel Composition Freeboard
- ✓ Speed
- ✓ Cargo and Open Deck Space
- ✓ Type of operation / project
- ✓ Data being carried
- ✓ Vessel Hardening
- ✓ Specific training
- ✓ Length of the escort / project
- ✓ Time spent in area of high risk (Exposure)
- ✓ Piracy Activity specific to the area and wider region
- ✓ Pirate activity trends
- ✓ Geographical features considerations (near shore, deep water, riverine, Delta)
- ✓ Correct Navy Command
- ✓ Prevailing Weather.

The WAF Operations Team also use AIS tracking via the Vanguard Tech platform to monitor the vessels routing and any new or potential incident analysis to support the client vessel in its routing and voyage preparedness.

Newly identified risks are communicated to the armed SEV and the client vessel during deployment to help in the management and reduction of risk.

## COMMUNICATIONS

Communication is critical to the success of every security operation and Seagull Maritime employs a robust and reliable communications system that intends to provide seamless communications throughout the operation.

Every deployed Armed SEV has a number of communication systems such as VHF, Satellite Phone and Email access.

Armed SEV's are to communicate with the WAF Operations Team, and the Client Vessel, as required and laid out in the instruction notice for each task.

Armed SEV's are to refrain from direct communication with the owners, operators or managers of the Client Vessel. All such communications are to be done by Seagull Maritime WAF Operations Team or the Commercial Department.

The WAF Operations team are responsible for liaising and communication with the Seagull Maritime Commercial Department, the Armed SEV and the Client Vessel as well as the owners, operators and managers of the Client Vessel.

When WAF Operations are communicating with the Armed SEV care must be taken regarding the CC list when emailing so as not to include any unnecessary addresses.

Information exchanged between WAF Operations and the Armed SEV is highly confidential.

WAF Operations will communicate with the Client Vessel for operational instructions, guidance and assistance.

Emails to and from WAF Operations and the Client Vessel CLIENT VESSEL will maintain the CC list as agreed with the client.

The Commercial Department is the primary contact with the client and will bridge any communications above and beyond the operational level between WAF Operations and the client.

All security related events and incidents are to be logged and reported appropriately including:

- ✓ Incidents
- ✓ Near Misses
- ✓ Relevant incidents or events in the surrounding area
- ✓ Status of equipment
- ✓ Any training and drills
- ✓ Safety issues involving security and vessel movements.

Training requirements for all WAF personnel are defined in the Training and Competence Matrix (SM/INT/REG/008). BRAGs (Basic Risk Assessment Guides) are available through the Seagull Safety Reporting App for frontline reference.

NOTE: If there are any conversations / information that the Master / MSLO of the Armed SEV feels are too sensitive to be discussed on open channels such as VHF radio they should be conducted using the satellite telephone or bridge to bridge closed comms.

All incidents, near-misses and observations must be reported through the Seagull Safety Reporting App (report.seagullmaritimeltd.com) in addition to verbal reporting through the chain of command.

## Security Incident Definitions

The following terms when identifying and monitoring threat sources and risks to the escort operation will be used:

**Approach:** A movement by assailants towards a vessel, a maritime asset or individuals in the maritime domain, which is perceived to be aggressive or abnormal.

**Attack:** An attack on a vessel, a maritime asset or individuals in the maritime domain, which is motivated purely by an intention to cause damage to property and/or to harm persons.

**Attempt:** An unsuccessful attempt to attack a vessel, which includes an approach and engagement by the assailants.

**Hijack:** A successful attack resulting in the capture of a vessel or maritime asset.

**Kidnap:** The abduction of an individual or individuals from a vessel or maritime asset.

**Robbery:** The theft of property from a vessel or maritime asset by using, or threatening to use, violence towards individuals.

**Suspicious activity:** A general warning of suspicious activity, often relating to the presence of a suspected pirate group.

**Terrorism:** An attack (assault, hijack, kidnap) or attempt on a vessel or maritime asset by a designated terrorist entity or affiliates.

If any such incident occurs, then the Armed SEV must immediately notify WAF Operations for further actions and guidance.

WAF Operations will instigate the emergency response and take all appropriate actions depending on the incident and relative information gathered and in accordance with Incident Management Procedures.

## LOCAL ARMED FORCES DEPLOYMENT

Seagull Maritime, due to local and governmental restrictions, do not deploy armed personnel to deployed SEV's or onboard client vessels.

Where requested, we may deploy a Maritime Security Liaison Officer (MSLO). Any MSLO is deployed unarmed and has no access to Seagull Maritime or Local Forces weaponry, ammunition or security equipment.

In line with local and national laws in the region, SEV's contracted by Seagull Maritime will embark local naval forces to provide armed security for the SEV, the crew and the escorted client vessel.

The embarked naval team operates under the SOP's and Rules of Engagement (not RUF) of their Navy that has the mandate to protect the Nations interest within the full extent of the relevant and applicable EEZ.

The naval team has, or will, embark weapons and ammunitions on Seagull Maritime contracted SEV as is deemed appropriate by the local navy to provide effective and results driven security.

- ✓ The Naval Team will be comprised of 6 - 10 active-duty personnel.
- ✓ The Naval Team will operate as a rapid reaction force in the event of a security incident as deemed necessary.
- ✓ The Naval Team on board will provide liaison with other NN units in the operational area.

While this procedure is shared, and advised to the relevant local governmental authorities, the naval team have overriding authority to act as they deem necessary to prevent a security threat or incident by virtue of being within their own territorial jurisdiction or EEZ and sovereignty.

Seagull Maritime take all possible steps to ensure that embarked forces are aware of our procedures and policies applicable to the security operation.

WAF Operations shall ensure the timely embarkation and disembarkation of the local naval teams by checking that all the preparations have been made 4 hours prior to the scheduled deployment.

Periodic routine checks to be sent to the Master of the Client Vessel to determine if the team onboard is successfully conducting its security duties. Should an issue arise, the same must be communicated to the Navy base that the team has been deployed from. This is done through our appointed Local Provider (MOU holder) and/or directly through the channels of communication Seagull has with the local forces. If the initial communications fail to produce the required results, then the issue is escalated appropriately.



## RULES ON THE USE OF FORCE/RULES OF ENGAGEMENT

RUF is policy only and applicable only to Private Security Companies (PSC's) and Private Maritime Security Companies (PMSC's).

Local Naval Teams will employ their military Rules of Engagement in response to any threat or attack.

Prior to deployment of local forces, Seagull Maritime will present our company's Human Rights and Security Operation policies and local forces personnel are respectfully asked to be comply as best as possible with the companies' procedures as best practices and the respect for human life.

### Graduated Response Example

**STATE GREEN**

Sailing in high-risk waters with a high likelihood of a security incident. Stance should be alert and on lookout.

**STATE ORANGE**

Conditions are in place to be on a heightened state of alert such as received intelligence of a PAG in the vicinity, unknown vessels on radar or visually with a potential for substantial threat and incident.

Heightened alert state and readiness.

**STATE RED**

Security incident is imminent or unfolding requiring an immediate response.

## Local Forces Rules of Engagement (ROE)

**Firearms should only be used as a last resort and must never be left unattended.**

General ROE to be expected for the use of firearms by a local forces Team Member when there has been positive identification of a craft/vessel with hostile intent.

### A) CHALLENGE / A challenge is to be made via loud hailer and/or VHF

**"XXXX NAVY - STOP OR I WILL FIRE"**

*(Repeat Twice)*

A challenge must be given before engaging targets unless:

To do this would increase the risk of death or grave injury to you or any other person(s) other than the attacker(s)  
You or others in the vicinity are under armed attack  
The environmental conditions or situation determine that this will not be heard (you may fire warning shots in this scenario)

### B) WARNING SHOTS

In the case of an attacking craft or positively identified pirate skiff and where a verbal command has been given and ignored, or is not possible, and/or the intent of the attackers is clear, **WARNING SHOTS MAY BE FIRED** to gain the attention of the attackers and indicate to them that the vessel has armed security on-board.

*\*Warning shots should be aimed at a safe distance to the side of the approaching skiff so that the chance of ricochet and/or danger to the occupants of the skiff is minimised.*

*\*\*The person making the warning shots must account for the speed and angle of the approaching skiff, and the potential for the warning shot/s to hit the skiff if not aimed with consideration to the skiffs approach*

### C) ESCALATION OF FORCE/POTENTIAL LETHAL FORCE

Where repeated challenges and/or warning shots have failed to deter the threat, you are only to open fire on a person/pirate if they are committing, or are about to commit, an act likely to endanger your life and there is no other way to prevent the danger.

1. Fire only aimed shots.
2. Fire no more rounds than are necessary.
3. Take all reasonable precautions not to injure anyone other than your target

## OPERATIONAL PROCEDURE FOR DEPLOYMENT & ESCORTING

The step-by-step procedure from client nomination of Seagull Maritime to end of each task and serves as the “checklist” to be followed. This procedure guarantees the uniformity of actions to be taken and upholds the quality of service that Seagull is committed to.

### Nomination Receipt

Seagull Commercial Department is responsible for the communications with clients and potential clients, of all commercial aspects and all the pre-operational comms.

Once an offer has been accepted by the client and a nomination message is received, the Commercial Department will communicate by email the task to the WAF Operations Team including all details agreed with client. All this information will be reflected in the “**TASK ORDER**”.

### Welcome Message

As soon as operations has received by email the task details from the Commercial Department, the WAF Operations Team will send a welcome message to the Client Vessel and client stating the following together with the Vessel Information Form (VIF).

Dear Master ....

Good day to you and your crew, we hope that all is well onboard your good vessel.

We are pleased to announce that SEAGULL has been nominated by .... (Nominating Party, Owner or other) to provide your good vessel with our security protective services during your stay in Nigerian waters.

One of our state-of-the-art Armed Security Escort Vessels (ARMED SEV) will meet with your good vessel at RVP XX.XX N - XX.XX E on your ETA which has been noted to be XX(Day numeric) XXXX(Month in writing) XXXX(Year numeric) at XX:XX(Time in 24hr mode)

We will revert in due course with all relative information concerning the ARMED SEV allocated to this task and further operational details including the updates on the current threat environment.

Kindly note that we are now tracking your vessel through AIS and monitoring your surroundings. Please keep us duly informed of any changes to your ETA at RVP.

Respectfully,

This welcome message should be sent maximum 1 hour after receiving notice from the CD.

## Vessel Allocation

On receipt of the tasking notification and details, WAF Operations will allocate the most suitable SEV for the task that will be able to conduct the security operation with optimum results and minimum costs.

A back up vessel is also nominated in accordance with our redundancy policy in the event the nominated SEV encounters issues of any nature or delay and is unable to meet the mission's requirements.

## Task Preparation

Once the SEV is allocated, WAF Operations will proceed with all required actions to make the security operation ready. Attention should be paid to the communicated task duration which may be extended further.

Operational optimisation is key and under no circumstance will any action be taken that may cause delays and inflict repetitional damage or a security gap.

During the preparation stage WAF Operations will send by email to the Client Vessel and client, the "Operation Instructions and Armed SEV details" message.

This message will contain the following:

- ✓ Armed SEV details such as Name, IMO No., MMSI, Call Sign, LOA, Flag etc., as well as photos for recognition purposes.
- ✓ Armed SEV contact details
- ✓ Master's and MSO's details
- ✓ Operational details of the task such as RVP, coded verification sequence, sailing route, standby procedure, expected weather conditions, hostile activity in region and other intelligence to be shared.
- ✓ Emergency response contact numbers to include Seagull 24/7 hotline, MDAT GoG, NIMASA, Nigerian Navy etc.

Sample of email structure is below:

Dear Master,

Good day to you and your crew.

Please find below information of the Armed Security Escort Vessel that will be providing close protection for your call to XXXXXX terminal Nigeria, communications, RVP verification sequence procedure, as well as emergency telephone numbers and contacts.

Kindly keep us duly informed on your ETA to the RVP: XXXXXX Current ETA noted is at: XXXXXX / XXXXXX

## 1. Operation Scope

Our M/V XXXXXX will meet you at the above RVP and escort you under armed protection to XXXXXX (Terminal). Once at terminal we will remain on standby providing surveillance and close protection until completion of cargo operations. Upon receipt of cargo documents, we will again escort you out to the BOP which will be determined according to your exit course from Nigeria's EEZ. At the BOP we will bid you farewell and remain in position for 2 hours maintaining a watchful eye on your sailing. END of mission.

## 2. Armed Security Escort Vessel Data:

Vessel name: GUARDIAN XXXXXX

IMO: XXXXXX

MMSI: XXXXXX

Call Sign: XXXXXX

Sat Phone: XXXXXX

Email of vessel: XXXXXX

Masters Name: XXXXXX

Please see attached a photo of M/V XXXXXX:



### 3. Communications:

VHF contact on channels 16 & 8 will be established when in reach.

M/V XXXXXX will be instructed to establish communications with your vessel 2 hours prior of your arrival at the RVP.

### 4. RVP Verification Sequence Procedure:

The following questions should be made to M/V XXXXXX and the respective answers should be received:

Question (from M/T XXXXXX), Answer (from XXXXXX)

1. Security provider: SEAGULL
2. Code word: CITY OF ANGELS
3. Code number: 0001
4. Emergency Telephone Numbers:

SEAGULL Operations 24/7: +234 XXXXXX

### 4. Regional Emergency Response Contacts:

MDAT GOG / email: watchkeepers@mdat-gog.org / Tel: +33 298 228 888

Lagos RMRCC / Tel: +234 730 6618

Monrovia RMRCC / Tel: +231 770 092 229

Should you need any clarifications or further information do not hesitate to contact us at any time. Kindly confirm acknowledgement of receipt of this message.

Best regards,  
Operation Department

## Mobilization

Seagull will mobilise the Armed SEV in accordance with the Client Vessel ETA from the jetty or any other location deemed best and most appropriate.

The Armed SEV will be on location at the RVP at least 2 hours prior to CLIENT VESSEL arrival.

The ARMED SEV will be fully fuelled, provisioned with food and water and a full security team will be onboard with weapons and ammunition.

Mobilisation will be closely monitored by WAF Operations to avoid any delays or omissions.

## RV Procedure, Verification Sequence

The Armed SEV is required to be at the RVP 2 hours prior to CLIENT VESSEL arrival to secure the area and make the Client Vessels approach safe.

As soon as the Armed SEV arrives at the RVP, WAF Operations will be notified immediately.

**Comms Check: WAF Operations contact the Armed SEV by email and satphone to establish communications.**

WAF Operations will send an email to the client vessel and CC list confirming the Armed SEV's arrival at the RVP.

The Armed SEV will call by VHF the Client Vessel. If the Client Vessel is not within range, then a call will be placed via satellite phone. Once contact is established the Armed SEV will make known that it has arrived at the RVP.

When the Armed SEV and the Client Vessel are at a distance of 10 NM and well within VHF range, the verification sequence will begin.

The verification sequence is as follows:

### RVP Verification Sequence Procedure:

The following questions should be made to M/V XXXXXX and the respective answers should be received:

Question (from M/T XXXXXX) Answer (from XXXXXX)

1. Security provider: **SEAGULL**
2. Code word: **CITY OF ANGELS**
3. Code number: **0001**

Additional questions may be asked by the Client Vessel which will be answered by the Master of the Armed SEV or the MSLO (if on board). When this procedure is completed the Armed SEV will suggest a dedicated VHF channel other than CH 16 & 8 for communications between the 2 vessels.

## Escorting

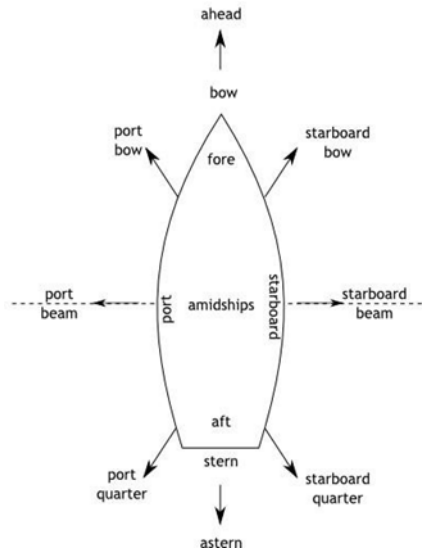
As soon as the Armed SEV and the Client Vessel meet, the escort will begin without any delay or change of speed of the incoming Client Vessel which will not exceed the agreed and contracted escorting speed.

## Armed SEV Positioning

The distance between the Armed SEV and the Client Vessel should be between 300 and 500 meters and never above 1 NM for any reason.

The Armed SEV will be positioned on the Client Vessel's Port Quarter or Starboard Quarter and at 30-minute intervals will perform a change of position between the two.

**Figure 6: Armed SEV Positioning**



During the transit and in communication between the Armed SEV and the Client Vessel, the Armed SEV will perform a fast “go around” of the Client Vessel and repeat this as the Master of the Armed SEV and the MSLO (if embarked) see fit.

At all times a security bubble of 2 NM should be maintained around the Client Vessel and no unidentified vessel, or craft may be permitted to enter this 2 NM zone. The only exception to this rule is if the Client Vessel is within a terminal Maritime Exclusion Zone (MEZ) and under terminal security jurisdiction.

## Target Recognition & Interdiction

In the case of an identified “target” either via radar of the Armed SEV or the Client Vessel, or by visual means, the Armed SEV will perform the identification sequence of the target.

If the target has no AIS and is deemed to be suspicious the identification sequence will be stepped up with a VHF call to determine the identity and intentions of the craft.

If there is further suspicion or if the intentions of the target are unclear or deemed possibly hostile, then the Armed SEV will position itself between the Client Vessel and the target in a fashion that will allow for interdiction.

At this stage RUF and ROE may be invoked.

## Communications During the Escort

Further to the initial communication sequence leading to the verification, the Armed SEV is to maintain contact with the Client Vessel on the agreed VHF channel every 30 minutes as a standard or as often as is required based on actual events.

# SOP – WEST AFRICA SEV



The 30-minute interval comms are essential in maintaining a high level of alert and cooperation. The dialogue is:

- ARMED SEV: M/T XXXXXX, M/T XXXXXX this is (ARMED SEV name), how do you copy?
- Reply from CLIENT VESSEL
- ARMED SEV: M/T XXXXXX, please advise your status?
- Reply from CLIENT VESSEL "All clear"
- ARMED SEV: M/T XXXXXX, well noted, will check again in 30 minutes

If the Client Vessel replies informing of any impediment or other situation on board such as a security breach, technical issue, medical emergency or other, the Armed SEV is to inform WAF Operations immediately and take all appropriate response measures in cooperation with Ops.

If at any moment during the mission there is an emergency, alert or anything out of the ordinary, then the Armed SEV Master or the MSLO (if embarked) is to contact WAF Operations immediately for instructions and guidance.

## **Stand By**

Once the escort from the RVP to terminal has been successfully achieved, the Armed SEV depending on the contractual terms has 2 options, to disengage and continue under orders from WAF Operations accordingly or to remain on location in standby mode.

If the Client Vessel has given the Notice of Readiness (NOR) but has not been received by the terminal yet, the Armed SEV is to remain alongside patrolling and providing close protection to the Client Vessel.

If/ when the Client Vessel has been accepted by the terminal and has entered the MEZ of the terminal, the Armed SEV is to communicate with Terminal Security and request permission to remain alongside the Client Vessel. If this permission is granted, then the Armed SEV will take position as instructed and drift with M/E on standby providing close protection in Client Vessel's immediate zone not exceeding 1 NM with a maximum drift pattern/distance of 2 NM.

If permission is not granted for the Armed SEV to enter the MEZ, then the Armed SEV is to maintain position at the shortest possible distance from the Client Vessel providing area surveillance and emergency response in case of any security incident.

Upon the completion of cargo operations and receipt of cargo documents the Armed SEV will approach the Client Vessel and escort out to the Break Off Position (BOP) under the same guidelines of all escort missions.

## **Break Off Position (BOP)**

The Break Off Position is the agreed location between Client, Client Vessel and Seagull Maritime where the escort mission ends. The BOP is communicated in geographic latitude and longitude (coordinates) by WAF Operations to the Armed SEV. When the Armed SEV and Client Vessel reach the BOP, the Master or MSLO (if embarked)

notify the Master of the Client Vessel and declare the end of the mission. The Client Vessel continues its international journey leaving Nigerian waters and the Armed SEV remains at said location for another 2 hours monitoring the departure of the Client Vessel and securing the vicinity.

## **Demobilization**

Commencing each operation, the Armed SEV will proceed either to the next task, a waiting area or back to the jetty. Following orders will be provided by WAF Operations prior to the completion of each task.

## **CONTINGENCY MANAGEMENT**

The operator shall ensure the timely departure of the SEV from her home jetty by checking that all the preparations have been made 4 hours prior to the predefined ETD. In case of a delay or unclear update, the request shall be shared to an additional provider who will be activated in case the former cannot support.

The lead operator shall ensure that the contractual terms of the GUARDCON agreement such as speed and route are followed by the parties involved. This is achieved by the utilization of Vanguard Tech' online platform as Seagull's main tracking platform and by properly communicating the operation instructions to the Client Vessel and the SEV. If the SEV or the Client Vessel do not comply, WAF Operations shall intervene via the available communication channels and resolve the issue.

In case of a mechanical failure of the SEV enroute that obstructs the safe completion of the escort, WAF Ops shall monitor and scan the surrounding area for possible alternatives while sending out requests to our pool of LPs.

A non-conformity is to be raised with the Compliance Department should a Local Provider fail to provide the quality level required and agreed with Seagull Maritime and actions under the Supplier Approval Procedure taken as necessary.

For every operation, contingencies have been placed to counter any issue that may arise. Each Local Provider nominating a SEV is required to allocate a backup SEV should there be any issue with the first,

Additionally, as appropriate, Seagull Maritime may place a second Local Provider on standby should the first fail for any reason. In line with this risk mitigation.

WAF Operations identifies SEVs potentially operational offshore and makes preliminary introductions on the potential for the need to support on an urgent basis.

## INCIDENT MANAGEMENT

### HEALTH, SECURITY, SAFETY ENVIRONMENT (HSSE)

Within our relevant management systems, we have documented policies where it is clearly understood that Health and Safety, Security and protecting the Environment is a priority for Seagull Maritime. All staff, personnel and stakeholders are to abide by and follow the policies and procedures in place. These documented policies and procedures apply both ashore and onboard our fleet vessels and govern every aspect of our day-to-day business.

### INCIDENT & CRISIS MANAGEMENT

Seagull Maritime have a documented Incident & Crisis Management Plan (IMP) that all staff and personnel are to be familiar with and able to implement accordingly.

The IMP outlines in detail the reporting and management of incident or crisis and should be referred to alongside the abbreviated guidance provided here.

An Incident is defined as any unplanned or uncontrolled Event or chain of Events that has resulted in recordable injury, illness or physical damage or environmental damage.

A Near Miss is defined as an unplanned or uncontrolled event or chain of events that has not resulted in a recordable injury, illness or physical damage or environmental damage but had the potential to do so in other circumstances.

All Seagull employees, contractors, supplier and stakeholders are required to report any HSSE incident, security incident or near miss to WAF operations who, in turn, will activate the IMP as required

Any fatality, serious injury or significant accident must be reported immediately to WAF Operations which in turn will activate the Crisis Response Team as per the IMP.

Actions to be taken immediately after the incident:

- ✓ Take prompt emergency action (First Aid etc.)
- ✓ Make area safe prior to any further action
- ✓ Send immediate alert/report to operations centre/senior management
- ✓ Preserve the scene - Information needs to be gathered before it is lost
- ✓ Identify witnesses and obtain statements (to include Name, date of incident description of incident, signature and date as well as any other information necessary)
- ✓ Take pictures and/or sketches/ measurements of evidence that may be destroyed by weather, or may need to be moved
- ✓ Perform substance abuse tests where appropriate
- ✓ Isolate parts, tools or equipment involved in the incident
- ✓ Isolate the incident scene where possible

Serious incidents may be classified as Crisis Situations. If such a situation is declared by senior management, the IMP Crisis Management Team will be implemented. This document describes and communicates the framework for recognizing and responding to any crisis event. It includes the processes that are to be followed in order to identify, assess, understand, and recover from any adverse situation. The aim remains to protect all personnel from harm and maintain the integrity of Seagull Maritime and our security operations.

## **PAG ATTACK ON VESSEL**

Should a vessel come under attack by a PAG or other force, the escort vessel and embarked security team are responsible for the prevention and or deterrence of the attack.

## **ATTACK IN PROGRESS**

On receipt of contact from the Master of the client vessel that an attack is imminent and/or in progress:

### **WAF Operations > Client**

Advise the client, by telephone, of the incident and provide continual updates as received. Email is to be used for confirmation of the attack only.

Confirm with the Master if he has communicated to MDAT-GOG, if not, EOS GOC will do so on their behalf.

Upon receipt of incident report, provide copy to client.

### **WAF Operations > WAF Director**

Advise the WAF Director, by telephone, of the incident. Email is not to be used unless for confirmation only.

The WAF Director will contact the members of the Crisis Response and Incident Management Team as per the IMP.

The WAF Director will convene a meeting of the Crisis Response and Incident Management Team at the earliest possible opportunity.

### **WAF Operations > Vanguard Tech**

Advise the Vanguard Tech Team of the attack and provide concise details to allow the department to create an immediate intelligence alert for all client vessels in the area.

### **Incident Management Team**

The Incident Management Team will monitor the attack/event and agree on appropriate actions as appropriate and as per the Incident Management/Crisis Response Plans in place.

## **ATTACK ENDED**

On confirmation from the Master of the client vessel that the attack has been deterred or prevented:

## **WAF Operations > Client**

Immediately advise the client of the successful prevention of the attack.

## **Incident Management Team**

Review the incident and assign the Compliance Manager to investigate and compile the Incident Report.

## **Compliance**

Contact the local agent and request local forces report on the incident/attack and actions taken.

Contact the client vessel Master and request report on the incident/attack and actions taken.

Review the response from Seagull Maritime, local agent and local forces and compile a detailed incident report.

## **Compliance > Client**

Provide a copy of the incident report to the client and arrange a suitable time to meet with the client and review the findings.

## **HIJACK/KIDNAP EVENT**

Seagull Maritime will convene their Crisis Response Team in line with the IMP.

The Crisis Response Team will work with the Client, local agents and government agencies and vessel where applicable, to decide on appropriate actions and decisions.

Operating procedures will be defined as per the nature and level of response required by the Crisis Response Team and in agreement with the Client, local agents and government agencies.