



**GROUP COMPLIANCE
DIRECTOR**

Group Compliance Director



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Applicable Entities	Seagull Maritime FCZO, Seagull Maritime Malta, Seagull Maritime Nigeria, Seagull Maritime UK, Seagull Offshore

INTRODUCTION

The Group Compliance Director is the senior compliance officer for the Seagull Maritime group, responsible for the strategic direction, development and oversight of all management systems across the organisation. The role carries ultimate accountability for ensuring the group meets its obligations under all applicable ISO standards, client contractual requirements, regulatory frameworks and industry codes of conduct.

The Group Compliance Director is contracted via Seagull Dubai FZCo and operates across all group entities. The role encompasses security management system ownership, integrated management system architecture, certification body and client relationships, risk management strategy, and the leadership of the compliance function including the QHSE Manager and Compliance Administrator.

The Group Compliance Director reports to the Chief Executive Officer and holds co-approval authority on all management system documentation alongside the CEO.

REPORTING STRUCTURE

- Reports to: Chief Executive Officer (Pavel Shparber)
- Direct reports: QHSE Manager, Compliance Administrator
- Works alongside: Chief Commercial Officer, Operations Directors, HR & Training Manager
- Location: Dubai, UAE (Seagull Dubai FZCo)

Group Compliance Director



CORE RESPONSIBILITIES

Strategic Compliance Leadership

Provide strategic direction for the group's compliance and management system programme, ensuring the organisation maintains and continuously improves its integrated management system.

Responsibilities include:

- Setting the strategic direction for compliance across all entities and management systems
- Defining the management system architecture and document hierarchy
- Establishing and maintaining the document referencing system and folder structure
- Driving the integration of ISO 45001, ISO 18788, ISO 28007, ISO 28000 and ISO 9001 into a unified management system
- Leading the Combined Work Programme (SM/INT/CMP/002) and ensuring deliverables are tracked to completion
- Identifying gaps in the management system and prioritising remediation
- Representing the compliance function at board level and in strategic planning

Security Management System Ownership

Retain direct ownership of the security management systems covering ISO 18788 (Private Security Operations Management), ISO 28007 (Ships and Marine Technology — PCASP) and ISO 28000 (Security Management for the Supply Chain).

Responsibilities include:

- Maintaining and improving policies, procedures and SOPs for security operations
- Conducting and reviewing operational risk assessments for all service lines (IOR, WAF, PG, Offshore)
- Ensuring compliance with the International Code of Conduct for Private Security Service Providers (ICoC)
- Ensuring compliance with the Voluntary Principles on Security and Human Rights (VPSHR)
- Managing weapons compliance documentation, licensing requirements and flag state approvals across all jurisdictions
- Overseeing rules of engagement, use of force policy and operational control documentation
- Maintaining conflict zone monitoring and ensuring threat intelligence informs operational risk assessments

Group Compliance Director



Certification Body and Client Relationships

Act as the primary point of contact for the certification body (Libero Assurance) and major clients requiring compliance assurance.

Responsibilities include:

- Managing the relationship with Libero Assurance across all ISO certifications
- Leading external certification, surveillance and recertification audits
- Managing scope changes and new certification applications (e.g. ISO 45001 addition)
- Leading responses to client due diligence reviews and CSO assessments
- Managing the due diligence portal and ensuring documentation is current and accessible
- Maintaining Shell VPSHR, HSSE and DD compliance and leading Shell audit preparation
- Building and maintaining relationships with industry bodies including ICoCA

Risk Management

Provide strategic risk management leadership across the group, establishing frameworks and methodologies for risk identification, assessment and control.

Responsibilities include:

- Defining the group's risk management framework, methodology and escalation pathways
- Developing and maintaining risk assessment templates for operational (H&S) and security (PESTLE) risk assessments
- Overseeing the corporate risk and opportunity register
- Conducting the Context of the Organisation (PESTLE and SWOT) analysis and emergency reviews
- Monitoring conflict zones and geopolitical developments affecting operations (Iran/Hormuz, Red Sea, Gulf of Aden, West Africa)
- Providing risk-based input to commercial decisions, bid preparation and new service line development
- Ensuring risk management processes are integrated across all ISO standards

Internal Audit and Management Review

Lead the internal audit programme and management review process at the strategic level.

Responsibilities include:

Group Compliance Director



- Defining the internal audit programme scope and schedule across all management systems
- Conducting internal audits for security management systems (ISO 18788, 28007, 28000)
- Reviewing and approving internal audit reports prepared by the QHSE Manager
- Leading management review meetings and ensuring all required inputs and outputs are addressed
- Tracking audit findings, NCRs and corrective actions to closure through the NCR/OFI/CAPA Register
- Preparing management review reports and presentations for senior management

Non-Conformance and Corrective Action Oversight

Oversee the organisation's NCR/OFI/CAPA process and ensure systemic issues are identified and addressed.

Responsibilities include:

- Final review and approval of root cause analyses and corrective action plans
- Monitoring NCR/OFI/CAPA trends across all management systems
- Ensuring corrective actions are effective and verified before closure
- Escalating systemic non-conformances to senior management
- Managing external audit findings (certification body, Shell, client audits) through to closure

Policy, Procedure and SOP Development

Author and approve management system documentation to a standard that meets or exceeds client and certification body expectations.

Responsibilities include:

- Writing policies, procedures, SOPs and operational guidance documents
- Establishing and enforcing document formatting standards across the management system
- Reviewing and approving documents prepared by the QHSE Manager and Compliance Administrator
- Managing the document lifecycle including version control, review scheduling and archival
- Maintaining the Document Register (SM/INT/REG/001) and Reconciliation Matrix (SM/INT/REG/005)

Group Compliance Director



Due Diligence and Client Compliance

Manage the group's due diligence and client compliance programme, ensuring the organisation can demonstrate compliance to prospective and existing clients.

Responsibilities include:

- Maintaining the due diligence document repository and portal
- Responding to client due diligence questionnaires and compliance assessments
- Preparing evidence packs for major client reviews (Shell, oil & gas majors)
- Conducting due diligence on third-party providers including VBA operators (PSS/Pavarotti)
- Ensuring the organisation's compliance posture supports commercial bid and tender activities

Compliance Technology and Innovation

Drive the adoption and development of compliance technology solutions to improve efficiency, reporting and engagement across the organisation.

Responsibilities include:

- Managing the Emergent HSE App for incident and near-miss reporting across all entities
- Managing the Emergent LMS platform for compliance training delivery, including AI-powered quiz generation and certification
- Designing and delivering compliance awareness campaigns ("Your Watch. Our Standard.")
- Identifying opportunities for technology-driven compliance improvement
- Coordinating with technology partners (Vanguard Tech) on shared compliance infrastructure

Compliance Function Management

Lead and develop the compliance function, building capability and ensuring effective delivery across all management systems.

Responsibilities include:

- Line management of the QHSE Manager and Compliance Administrator
- Setting objectives, conducting appraisals and managing performance of direct reports
- Mentoring and developing team members, including structured development pathways
- Resource planning and recruitment for the compliance function

Group Compliance Director



- Ensuring adequate coverage across all management systems and operational regions

Regulatory and Legal Compliance

Ensure the organisation maintains compliance with all applicable legal and regulatory requirements across its multi-jurisdictional operations.

Responsibilities include:

- Maintaining the legal and regulatory requirements register across all jurisdictions (Malta, UAE, Greece, Nigeria, UK, Falkland Islands)
- Monitoring regulatory changes and sanctions requirements affecting operations
- Ensuring weapons licensing, export controls and controlled goods compliance
- Coordinating with legal advisors on compliance matters
- Anti-corruption compliance (UK Bribery Act, FCPA) and GDPR obligations

SKILLS AND EXPERIENCE

Essential

- Extensive experience in compliance management within maritime security, private security, defence or a closely related sector
- Demonstrated expertise in ISO 18788, ISO 28007 and at least one of ISO 28000, ISO 9001 or ISO 45001
- Experience managing multi-standard integrated management systems
- Experience leading certification audits and managing certification body relationships
- Strong understanding of VPSHR, ICoC and human rights obligations in the private security context
- Experience conducting and managing risk assessments in high-risk operational environments
- Proven ability to write professional policies, procedures and SOPs to a high standard
- Experience managing client due diligence processes and major client compliance programmes
- Strong leadership skills with experience managing and developing compliance teams
- Ability to operate independently at a strategic level across multiple jurisdictions

Group Compliance Director



Desirable

- Military or law enforcement background with operational security experience
- Experience with Shell VPSHR audit requirements and HSSE standards
- Knowledge of ISM Code and maritime safety management
- Experience with compliance technology platforms (LMS, HSE reporting, ERP systems)
- Experience working in the Gulf region and understanding of regional regulatory frameworks

QUALIFICATIONS

Essential

- ISO 18788 Lead Auditor or equivalent security management system qualification
- ISO 28007 Lead Auditor or equivalent maritime security qualification

Desirable

- ISO 45001 Lead Auditor
- ISO 9001 Lead Auditor
- NEBOSH or equivalent occupational health and safety qualification
- Formal risk management qualification

PERSONAL ATTRIBUTES

- Strategically minded with the ability to translate compliance requirements into practical, workable systems
- Direct communicator who writes clearly and speaks plainly
- Resilient under pressure and able to manage competing priorities across multiple entities
- High professional integrity — prepared to challenge non-compliance at any level of the organisation
- Committed to building genuine compliance culture, not just passing audits
- Pragmatic and solutions-focused — able to work within the constraints of a growing organisation
- Effective at building relationships with clients, regulators, certification bodies and operational teams

Group Compliance Director



WORKING ARRANGEMENT

Based in Dubai, UAE. Contracted via Seagull Dubai FZCo.

International travel required for audits, client meetings, operational oversight and certification body engagements across Greece, Malta, Nigeria, UK and operational regions.

This role carries group-wide responsibility across all Seagull Maritime entities including Seagull Maritime FCZO, Malta, Nigeria, UK and Seagull Offshore.

REVIEW

This job description shall be reviewed at the frequency defined in the Document Register (SM-INT-REG-001), or earlier if a significant change occurs to the role, reporting structure or organisational requirements.