

Document Title	Occupational Health & Safety Policy
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Owner	Group Compliance Director
Approved By	Pavel Shparber, CEO / Darren Watts, GCD
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ISO Standard	ISO 45001:2018 – Clause 5.2
Applicable Standards	ISO 45001 ISO 18788 ISO 28007 ISO 28000 ISO 9001

1. PURPOSE

This policy establishes the occupational health and safety (OH&S) commitments of the Seagull Maritime group. It has been developed and approved by top management in accordance with ISO 45001:2018, Clause 5.2, and provides the framework for setting OH&S objectives, eliminating hazards, reducing risks, and driving continual improvement of the OH&S management system.

This policy applies to all entities, locations, workers and activities within the scope of the OH&S management system as defined in the Scope Statement (SM/HSE/DOC/001).

2. POLICY STATEMENT

Seagull Maritime is committed to providing a safe and healthy working environment for all workers, contractors and other persons affected by its operations. The nature of our business – maritime security, offshore protection, fisheries protection and associated services – places our people in high-risk environments around the world. We recognise that effective health and safety management is not just a regulatory obligation but a fundamental duty of care to every person who works under our direction or on our behalf.

The CEO, as the senior accountable officer, and top management collectively commit to:

2.1 Prevention of Work-Related Injury and Ill Health

Providing safe and healthy working conditions for the prevention of work-related injury and ill health, appropriate to the purpose, size and context of the organisation and to the specific nature and OH&S risks of its activities. This includes operations aboard client vessels, vessel-based armouries, offshore and fisheries protection vessels, and all office-based workplaces.

2.2 Hazard Elimination and Risk Reduction

Maintaining a systematic process for the identification of hazards, assessment of risks and determination of controls using the hierarchy of controls. Where hazards cannot be eliminated, risks shall be reduced to the lowest level that is reasonably practicable. Risk assessments shall be

conducted for all operational activities, deployments, new service lines and significant changes to the working environment.

2.3 Fulfilment of Legal and Other Requirements

Identifying, maintaining access to, and ensuring compliance with all applicable legal requirements and other requirements relating to occupational health and safety. This includes the laws and regulations of every jurisdiction in which the group operates (Malta, UAE, Greece, Nigeria, United Kingdom, Falkland Islands and at sea), applicable flag state requirements, client contractual obligations including Shell HSSE requirements, and the commitments of the International Code of Conduct for Private Security Service Providers (ICoC).

2.4 Consultation and Participation of Workers

Establishing mechanisms for the consultation and participation of workers and, where they exist, workers' representatives in the development, planning, implementation, performance evaluation and actions for improvement of the OH&S management system. Seagull Maritime recognises that workers at all levels – including contracted maritime security operatives, offshore crew and office-based staff – have direct knowledge of the hazards they face and a right to participate in the decisions that affect their safety.

2.5 Continual Improvement

Committing to the continual improvement of the OH&S management system to enhance OH&S performance. This shall be achieved through the setting and monitoring of OH&S objectives, the analysis of incident and near-miss data reported through the Emergent HSE platform, the findings of internal audits and management reviews, and the closure of non-conformances and corrective actions managed through the NCR/OFI/CAPA Register (SM/INT/REG/004).

3. SPECIFIC COMMITMENTS

In addition to the mandatory requirements of Clause 5.2, and reflecting the specific context and risks of Seagull Maritime's operations, the organisation makes the following additional commitments:

3.1 Deployed Personnel

The safety and welfare of deployed security operatives, offshore crew and fisheries protection personnel is a priority at all stages of the deployment cycle: pre-deployment screening and briefing, operational deployment, and post-deployment debrief. Seagull Maritime will ensure that all personnel receive task-specific risk assessments, adequate personal protective equipment, and clear rules of engagement and safe systems of work before undertaking any operational activity.

3.2 Conflict Zone Operations

Operations in conflict zones and high-risk maritime areas – including the Indian Ocean, Gulf of Aden, Red Sea, Gulf of Oman, Persian Gulf, Strait of Hormuz and West Africa – require enhanced risk management, real-time threat intelligence and dynamic risk assessment. Seagull Maritime will ensure that conflict zone monitoring informs all operational decisions and that risk assessments are reviewed and updated in response to significant changes in the threat environment, including the ongoing Iran conflict and its impact on Gulf operations.

3.3 Weapons Safety

The procurement, storage, handling, transfer and use of firearms and ammunition is conducted in accordance with documented procedures, applicable weapons regulations in every jurisdiction and flag state, and the principles of the Use of Force continuum. All personnel authorised to carry or use weapons will be verified as competent, current in their training, and fully briefed on the rules of engagement for the specific deployment.

3.4 Incident Reporting and Learning

All workers, regardless of their contractual status, are encouraged and expected to report incidents, near-misses, hazards and unsafe conditions without fear of reprisal. Seagull Maritime operates a just and fair reporting culture. The Emergent HSE platform provides the primary reporting mechanism. All reports shall be investigated proportionally and the lessons learned communicated back to the workforce.

3.5 Health, Wellbeing and Fitness

Seagull Maritime will promote the physical and mental health and wellbeing of all workers, including access to support for personnel returning from high-risk deployments. Fitness-for-duty requirements shall be maintained for all operational roles and verified prior to deployment.

3.6 Supply Chain and VBA Safety

Where Seagull Maritime personnel interact with the operations of PSS (Pavarotti Shipping Services) or other third-party vessel-based armoury or service providers, Seagull retains responsibility for the safety of its personnel during those activities and will conduct due diligence on the safety management of those providers.

4. INTEGRATION

This policy is integrated with and supports the wider Seagull Maritime management system, including ISO 18788 (private security operations management), ISO 28007 (PCASP), ISO 28000 (security management systems) and ISO 9001 (quality management). Where health and safety requirements intersect with security, quality, human rights or operational obligations, the highest standard shall be applied.

5. COMMUNICATION

This policy shall be:

- Made available to all workers, including contracted security operatives, through the Seagull Maritime document management system and the Emergent LMS platform
- Available to interested parties on request and through the due diligence portal
- Communicated during induction, pre-deployment briefings and annual awareness training
- Displayed in all Seagull Maritime office locations
- Reviewed at each management review meeting to confirm its continued suitability

6. REFERENCES

- SM/HSE/DOC/001 – OH&S Management System Scope Statement
- SM/INT/DOC/002 – Context of the Organisation (PESTLE and SWOT Analysis)
- SM/HSE/REG/001 – Interested Parties Register
- SM/INT/REG/004 – NCR/OFI/CAPA Register
- SM/INT/CMP/002 – Combined Work Programme
- ISO 45001:2018 – Occupational health and safety management systems
- International Code of Conduct for Private Security Service Providers (ICoC)
- Voluntary Principles on Security and Human Rights (VPSHR)

7. REVIEW AND MAINTENANCE

This policy shall be reviewed at least annually as part of the management review process, or sooner if triggered by a significant incident, a material change in the operating environment (such as the commencement of operations in a new conflict zone), changes to legal or other requirements, or the results of an audit or management review finding. The emergency review provisions of the Context of the Organisation (SM/INT/DOC/002) may trigger an out-of-cycle review of this policy.

8. ENDORSEMENT

This policy is endorsed by top management and approved by the undersigned:



Darren Watts
Group Compliance Director
02/04/2026