



MANAGEMENT OF CHANGE PROCEDURE

Management of Change Procedure



Document Title	Management of Change Procedure
Document Ref	SM/INT/PRO/013
ISO Standard	ISO 9001 / ISO 18788 / ISO 45001 / ISO 28007
ISO Clauses	9001 6.3, 45001 8.1.3, 18788 8.1, 28007 8.1
Version	1.0
Classification	Internal
Effective Date	7 April 2026
Review Date	7 April 2027
Approved By	Darren Watts, Group Compliance Director Pavel Shparber, CEO
Supersedes	SM/PRO/CHA/001 (Change Management, July 2025)

1. PURPOSE

This procedure establishes the process for managing changes across the Seagull Maritime management system. It ensures that all changes are planned, assessed for impact, approved by the appropriate authority, implemented in a controlled manner, and communicated to affected parties.

This procedure addresses ISO 45001 Clause 8.1.3 (Management of Change), ISO 9001 Clause 6.3, and the change management requirements of ISO 18788 and ISO 28007. It supersedes SM/PRO/CHA/001.

2. SCOPE

This procedure applies to:

- Changes to management system processes, procedures, policies, and SOPs
- Changes to organisational structure or key personnel
- Changes to operational activities, regions, or service lines
- Changes to legal, regulatory, or client requirements
- Changes to contracts, orders, or commercial terms (including GUARDCON)
- Changes to technology, systems, or equipment
- Changes to the physical working environment or workplace conditions

This procedure does not apply to:

- Routine document updates that do not change intent (typographical corrections, formatting) – these follow SM/INT/PRO/002 (Control of Documents)
- Non-conformance corrections – these follow SM/INT/PRO/001 (Non-Conformance, OFI and Corrective Action Management)

3. REFERENCES

- SM/INT/FORM/003 – Change Request Form
- SM/INT/REG/009 – Change Request Register

Management of Change Procedure



- SM/INT/PRO/002 – Control of Documents
- SM/INT/PRO/001 – Non-Conformance, OFI and Corrective Action Management
- SM/INT/PRO/003 – Internal Audit Procedure
- SM/INT/PRO/005 – Control of Records
- SM/INT/PRO/006 – Incident and Crisis Management
- SM/HSE/PRO/001 – Hazard Identification and Risk Assessment Procedure
- SM/SEC/PRO/001 – Security and Business Risk Assessment Procedure
- SM/HSE/REG/002 – Legal and Regulatory Requirements Register
- SM/INT/REG/007 – External Standards and References Register

4. DEFINITIONS

Change Request: A formal request to modify any element within scope of this procedure, documented on SM/INT/FORM/003 and logged in SM/INT/REG/009.

Management of Change (MoC): The systematic process of identifying, assessing, approving, implementing, and reviewing changes to ensure they do not introduce unintended risks or degrade management system effectiveness.

Impact Assessment: An evaluation of the potential consequences of a proposed change on health and safety, security, operations, compliance, personnel, and stakeholders.

Emergency Change: A change that must be implemented immediately to prevent harm, legal breach, or operational failure. Subject to retrospective approval and documentation.

Planned Change: A change identified in advance, assessed, approved, and implemented through the full change request process.

Unintended Change: A consequence of another action that was not planned or anticipated. Must be identified, assessed, and mitigated per Section 10.

5. ROLES AND RESPONSIBILITIES

5.1 Group Compliance Director

- Owns this procedure and the Change Request Register (SM/INT/REG/009)
- Reviews all change requests for management system impact
- Conducts or commissions impact assessments for changes affecting H&S, security, or compliance
- Approves Low and Medium impact change requests
- Escalates High and Critical impact change requests to the CEO for approval
- Ensures post-implementation review is conducted for all significant changes
- Reports change management activity as a management review input
- Monitors for unintended changes arising from operational or organisational decisions

5.2 Compliance Administrator

- Receives and logs all change requests in SM/INT/REG/009
- Conducts initial screening of change requests for completeness and categorisation
- Routes change requests to the GCD for review
- Tracks change request progress and follows up on overdue actions
- Maintains the Change Request Register and associated records

5.3 Department Manager / Change Originator

- Submits change requests using SM/INT/FORM/003 for any change within their area
- Provides sufficient detail for impact assessment (what, why, who affected, risks)
- Implements approved changes within their area of responsibility
- Confirms implementation completion and effectiveness to the GCD
- Identifies training needs arising from approved changes

5.4 CEO

- Approves High and Critical impact changes
- Approves changes to organisational structure or key personnel
- Informed of all Emergency Changes within 24 hours

5.5 Legal

- Reviews all changes to contracts, orders, or commercial terms
- Reviews and approves all GUARDCON amendments
- Advises on regulatory compliance implications of proposed changes

6. CHANGE REQUEST PROCESS

6.1 Types of Change

Changes are classified as:

- Process and System Changes – modifications to management system processes, procedures, policies, SOPs, risk assessments, or documentation
- Operational Changes – new regions, service lines, vessel types, equipment, or working methods
- Organisational Changes – restructuring, key personnel changes, new roles, or reporting lines
- Regulatory and Standards Changes – new or amended legislation, ISO standard updates, client requirements, or flag state requirements
- Commercial and Contract Changes – modifications to active contracts, orders, GUARDCON amendments, or client scope changes
- Environmental and Workplace Changes – physical changes to offices, vessels, or work environments that may affect health and safety

6.2 Raising a Change Request

Any person may identify a need for change. Changes may also be identified through:

- Audit findings (internal or external)
- Incident investigations
- Management review actions
- Legal or regulatory updates
- Client feedback or due diligence findings
- Risk assessment reviews

The change originator completes SM/INT/FORM/003 (Change Request Form) and submits it to the Compliance Administrator via compliance@seagullsecurity.com or via the Campaign Portal online form (portals.seagullmaritimeltd.com/campaign/tools/change-request.html).

Management of Change Procedure



The Compliance Administrator logs the request in SM/INT/REG/009, assigns a CR number, and routes it to the GCD within 2 working days.

6.3 Impact Assessment

The GCD assesses each change request against the following criteria:

- Health and safety risk – does the change introduce, remove, or modify hazards? (Reference SM/HSE/PRO/001)
- Security risk – does the change affect threat assessment, armed response, or client security obligations? (Reference SM/SEC/PRO/001)
- Compliance risk – does the change affect ISO certification, flag state compliance, or legal obligations?
- Operational impact – does the change affect active deployments, SOPs, or operational readiness?
- Personnel impact – who is affected, what training is required, what communication is needed?
- Documentation impact – which documents, registers, or trackers require updating?

Based on the assessment, the change is categorised:

- Low Impact – affects a single document or process, no H&S or security implications. GCD approves.
- Medium Impact – affects multiple documents or personnel, minor H&S or operational implications. GCD approves after consultation with affected Department Managers.
- High Impact – affects operational capability, H&S risk profile, or compliance status. CEO approval required.
- Critical Impact – affects certification, legal compliance, or introduces significant risk. CEO approval required. May require external consultation (certification body, legal, flag state).

6.4 Approval

Low and Medium impact changes are approved by the GCD. High and Critical impact changes require CEO approval. All contract and GUARDCON changes require Legal review and approval regardless of impact category.

The GCD records the approval decision, any conditions, and the implementation timeline in SM/INT/REG/009.

Rejected change requests are recorded with rationale. The originator is informed within 5 working days of submission.

6.5 Implementation

The responsible person identified on the change request form implements the change within the agreed timeline. Implementation includes:

- Updating affected documents per SM/INT/PRO/002 (Control of Documents)
- Updating affected risk assessments if hazards or controls are modified
- Updating affected registers and trackers
- Delivering required training (new courses, toolbox talks, or briefings)
- Communicating the change to affected personnel
- Updating the DD portal and/or campaign portal if externally visible documents are affected

Management of Change Procedure



The responsible person confirms implementation completion to the GCD. The Compliance Administrator updates SM/INT/REG/009.

6.6 Communication

All approved changes are communicated to affected parties before implementation takes effect. Communication methods include:

- LMS course updates or new mandatory training
- Campaign portal bulletins for operational changes
- Direct email notification for urgent or targeted changes
- Toolbox talks or briefings for frontline operational changes
- Management review reporting for strategic or systemic changes

The communication method is determined during impact assessment and recorded on the change request.

6.7 Post-Implementation Review

All Medium, High, and Critical impact changes are subject to post-implementation review within 30 days of completion. The GCD assesses whether:

- The change achieved its intended outcome
- No unintended consequences have arisen
- Training and communication were effective
- All documentation was updated correctly
- Any further actions are required

The review outcome is recorded in SM/INT/REG/009. Where unintended consequences are identified, a new change request or NCR is raised as appropriate under SM/INT/PRO/001.

7. CONTRACT AND COMMERCIAL CHANGES

7.1 Client-Initiated Changes

Changes to active contracts, orders, or scope initiated by clients or suppliers are reviewed by Legal for contractual and regulatory implications. Legal advises the CEO and GCD on acceptance, negotiation, or rejection.

7.2 Company-Initiated Changes

Changes initiated by Seagull Maritime to contract terms, service scope, or commercial arrangements are coordinated through Legal. Legal notifies the client and negotiates resolution.

7.3 GUARDCON Amendments

Proposed amendments to GUARDCON contracts – by either party – are reviewed and approved by Legal only. Anyone identifying a need for GUARDCON amendments sends the proposed changes to Legal. Draft amendments are sent by Legal to the client for review and approval before any final draft and signing by both parties.

8. KEY PERSONNEL CHANGES

When a key personnel change occurs (departure, new appointment, or role change), the outgoing person conducts a handover with their successor. The handover covers:

- Active responsibilities and ongoing projects
- System access, credentials, and tools
- Key contacts and stakeholder relationships
- Outstanding actions, deadlines, and commitments

The handover does not need to be in written form, although written notes may be useful for reference. The Department Manager is responsible for confirming the handover is complete and adequate.

Key personnel changes affecting management system roles (GCD, CEO, Compliance Administrator) are reported to the certification body and updated in affected documentation.

9. EMERGENCY CHANGES

Where a change must be implemented immediately to prevent injury, legal breach, or operational failure:

- The change is implemented immediately by the most senior available person
- The GCD is notified within 24 hours
- The CEO is informed within 24 hours
- A retrospective change request (SM/INT/FORM/003) is completed within 5 working days
- The change follows the full impact assessment and post-implementation review process retrospectively

Emergency changes are flagged in SM/INT/REG/009 for management review reporting.

10. UNINTENDED CHANGES

The GCD monitors for unintended changes – consequences of other actions that were not planned or anticipated. Sources include:

- Operational decisions made without compliance consultation
- Personnel changes affecting system knowledge or capability
- Technology or system changes affecting processes
- External changes (regulatory, market, geopolitical) affecting operations

Where unintended changes are identified, the GCD raises a change request to formally assess and address the consequences. Significant unintended changes are reported to the CEO and recorded for management review.

Management of Change Procedure



11. RECORDS

The following records are maintained under this procedure:

- SM/INT/REG/009 – Change Request Register (all change requests, assessments, approvals, outcomes)
- SM/INT/FORM/003 – Completed Change Request Forms (retained per SM/INT/PRO/005)
- Impact assessment notes (attached to the change request record)
- Post-implementation review records
- Communication records (emails, bulletins, LMS notifications)

12. REVIEW

This procedure is reviewed annually or when triggered by:

- Certification body audit findings
- Client audit findings
- Significant change to the management system structure
- Regulatory or standards changes affecting change management requirements