

Security & Security Operations Policy



Document Title	Security & Security Operations Policy
Document Ref	SM/SEC/POL/001
ISO Standard	ISO 9001:2015 / ISO 18788:2015 / ISO 28007:2015 / ISO 28000:2022 / ISO 45001:2018
Version	1.0
Classification	Internal
Effective Date	2 April 2026
Review Frequency	As per Document Register defined review date, or upon significant change
Owner	Group Compliance Director
Approved By	Pavel Shparber, CEO / Darren Watts, Group Compliance Director
Applicable Entities	Seagull Maritime FCZO, Seagull Maritime Malta, Seagull Maritime Nigeria, Seagull Maritime UK, Seagull Offshore

INTRODUCTION

To assure our interested parties and demonstrate best practice, our security operations management system is established and maintained to meet the requirements of the international standard ISO 18788:2015 as well as ISO 28000:2022 and ISO 28007:2015 and is subject to periodic review and improvement to ensure that our success is sustained through resisting complacency and where appropriate exploiting opportunities to improve and innovate.

Seagull Maritime is committed to providing quality professional risk management services in the maritime environment and beyond, endeavouring always to meet budgetary requirements, time constraints, legal requirements and to meet the requirements of our stakeholders and our supply chain.

We aim to continually improve the services we provide to meet our client's requirements by giving them reasonable scope to perform due diligence for the management of the services retained and by delivering a service that we can justifiably be proud of. We aim to set the benchmark for service and expertise across our industry.

All Seagull Maritime employees are committed to meeting the requirements of this policy, understand its importance and act accordingly.

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OUR COMMITMENT



Seagull Maritime is committed to a coherent security operations management system dedicated to ensuring that our operations:

- Minimize risk by reducing likelihood and consequence
- Respects international, national and local laws
- Respects human rights, keeping them at the forefront of our thinking when conducting our operations, engaging with our supply chain and working with internal and external stakeholders.
- Conduct security management methodically, through design, development, application and analysis of appropriate security methods, and engaging in constant improvement.
- Meet the requirements of all binding laws and treaties, throughout the supply chain for home, flag, port, and coastal states and the applicable laws in the countries in which we operate.
- Satisfy our financial, operational and business requirements (including subcontractors and supply chain)
- Strive for continual improvement.

As an organisation guided by its values, Seagull Maritime is also committed to respecting the rights of stakeholders and will take positive steps to ensure we sustain success through activities such as sustainable resourcing and risk management practices to avoid, prevent and reduce the likelihood and consequences of disruptive or undesirable events including injury, ill health, pollution, and waste.

OBJECTIVES

Our security operations and security objectives are established to serve the intentions and commitments stated within this policy and across our integrated management system. The Group Compliance Director, in conjunction with the CEO and senior management, establishes measurable security objectives through the management review process. These objectives are documented in the Company Objectives Register (SM/INT/REG/006) and are reviewed at each management review meeting to assess progress, relevance and alignment with the current operational and threat environment.

Performance against these objectives and consequentially this policy will be monitored and reviewed by top management through a combination of internal audit findings, incident analysis, client feedback, risk assessment outcomes and operational performance data. Where objectives are not being met, or where new threats, opportunities or business changes emerge, corrective actions and revised targets are agreed through management review and documented accordingly.

Our objectives are established under the SMART principle (Specific, Measured, Achievable, Reasonable, Targeted) and we monitor our performance towards achieving our objectives through management review, setting specific departmental KPIs and internal auditing.

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COMMUNICATION



The promotion and communication of this policy and its underlying objectives throughout the Company including to all persons working under Seagull Maritime control is an internal control imperative.

Meaningful communication is achieved primarily through the medium of appropriate training and awareness to ensure people are aware of their role, as well as potential consequences of departure from specified procedures. This policy is also communicated to stakeholders and interested parties.

TRAINING AND AWARENESS

This policy and subsequent training are aimed at developing in each employee a sense of personal responsibility for sustaining success. Through adherence to this Policy by all personnel, Seagull Maritime aims to demonstrate its commitment to operational excellence: quality, health, safety, environment, and security. It is a core principle of this policy that all staff and personnel who may work on behalf of Seagull Maritime are trained to be aware of their responsibilities to this policy and our security operations management system. Likewise, any supplier or sub-contractor who wishes to contract with Seagull Maritime will be made aware of this policy, its objectives and our commitments and agree to follow the policy accordingly in any undertaking with Seagull Maritime.

CONTINUAL IMPROVEMENT

Seagull Maritime is committed to the continual improvement of its business, staff and management systems. To ensure this improvement occurs we commit to:

Measuring the quality of our security management and operational activity from client and stakeholder feedback and external and internal audits.

Systematically analysing and understanding any incidents.

Conducting a thorough internal audit programme on our security system.

Comprehensive analysis of all findings and data, to inform decisions on preventative and corrective actions.

Improving our methods based on instructions and guidelines from professional expert bodies.

Regular management review of our management systems.

Ongoing training for all staff and personnel.

Security & Security Operations Policy REVIEW



This Policy is reviewed by the top management of Seagull Maritime at planned intervals and on the occasion of significant changes that require further adjustments to the current legal, regulatory and operational frameworks.

Regular review assists the evaluation and continual improvement of our management systems.

A handwritten signature in black ink, appearing to read "Darren Watts".

Darren Watts

Group Compliance Director

02/04/2026