

 <b>ZMi</b> HOLDINGS <small>ZANDER MARINE INTERNATIONAL</small>	<b>SAFETY, SECURITY, HEALTH,  ENVIRONMENTAL AND  QUALITY MANAGEMENT MANUAL</b>	Document No.	SHEQMM-ANNEX-A
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<b>ANNEX A – SSHEQ POLICIES</b>			

**ANNEX A**

**THE COMPANY SSHEQ POLICIES**

## SAFETY, SECURITY, HEALTH, ENVIRONMENTAL AND QUALITY POLICY

The Company Management believes that, in providing comprehensive marine/subsea support services to the offshore industry, the Safety, Health and wellbeing of its employees including Contractors and all persons working under its control, together with the general public, as well as the protection of the Environment, are the overriding responsibilities and considerations in carrying out its diverse marine operations. The continual improvement of the Company's Safety, Security, Health and Environmental culture, embracing as it does the standards of services provided, constitutes the key element of the Company's strategic objectives in delivering the highest level of quality to its Clients.

The Company Management will make available the necessary resources and is obligated to continually measure and improve its Safety, Health, Environmental and Quality performance.

The company Management is committed to provide a safe and healthy working condition considering the purpose, size and context of the organization and considering the risks and opportunities and the achievement of its SSHEQ Policy through the attainment of the following goals.

- a) Zero harm to people, property, and the environment in all undertakings.
- b) Maintenance and continual improvement of the Company and all its vessels/MOU and Sites, in conformity with the ISM Code, ISO 9001:2015, ISO 14001: 2015, ISO 45001:2018 Standards, OSHAD SF and maintenance of safe and pollution-free operating practices.
- c) Compliance with all applicable legal, international, statutory, regulatory and consistent with customer requirements in respect of Safety, Security, Health, Environment and Quality.
- d) Maintenance of procedures for the ongoing identification of hazards, the assessment of risks and opportunities, the implementation of the necessary control measures with the firm aim of preventing ill-health and eliminating the work-related injuries, ensuring the wellbeing of all employees and to be prepared for any operational emergency that may arise.
- e) Practice of regular safety and emergency exercises, both onshore and offshore, and the development of a culture of SSHEQ awareness, personal discipline, and accountability through the application of the SSHEQ Management System.
- f) Promotion of open communications and employees' participation and consultation, via Company incentive schemes, suggestion/feedback cards, SSHEQMS review in measures aimed at continually improving Safety, Security, Health, Quality and protection of the Environment.
- g) Create a "no blame culture" and encourage reporting, focus on ways to correct mistakes and prevent recurrence.
- h) Recruitment of -competent employees, both onshore and offshore, holding qualifications, certification, job specific knowledge, training and experience to comply with the regulations. Continual improvement of their performance through the identification of their training needs and providing all necessary resources rewards etc., as applicable.
- i) Delivery of a high and continually improving level of quality standards of services by recognizing and meeting the internal & external interested party needs, requirements and expectations.
- j) Adherence, at all times, to the documented SSHEQ Management System operating procedures, through a system of internal/external audits/inspections, controls and verification.

It is the responsibility of all personnel, from Management through to all employees, to commit themselves fully to the goals of the SSHEQ Policy; to follow procedures and instructions at all times and to take the necessary precautions to protect and care for themselves, their colleagues, any passengers, the ship, its cargo, and the environment.

## DRUG AND ALCOHOL POLICY

The possession uses or distribution of alcohol or of illegal drugs or substances is strictly prohibited onboard company property, MOUs and vessels or on any company business. It is a serious offense and grounds for employment termination of any employee to be found using and in possession of or under the influence of alcohol, any illegal drug, substance, or any other legal but unlawfully used substance, including but not limited to prescription drugs obtained or used without permission or such drugs not being used for their originally intended purpose at any time during their tour of duty.

The company maintains '**Zero Tolerance**' with regard to the use of any drugs or alcohol (unless prescribed by a medical professional) and as such any tests that come back showing any amount of drug or alcohol content is automatically a failed test.

### **Zero tolerance = Zero Alcohol / Zero Drugs**

The company management is committed to a safe, healthy and productive working environment for all employees (both shore-based and onboard company vessels/MOUs).

Employees of other companies, suppliers and visitors are also required to observe the Drug and Alcohol Policy while on the Company premises.

It is the Master's/OIM's/Diving Supervisor's responsibility to ensure the effective implementation of this policy on board.

The following instructions shall be strictly complied by all company employees to contribute in the maintenance of a safe, healthy and productive working environment:

- a) The use or possession of alcohol is totally prohibited on board Company vessels/MOUs and in any of the Company's shore work sites, guesthouse, including offices.
- b) Unlawful possession, consumption, distribution or sale of drugs by any Company employee warrants instant dismissal and will render the person liable for legal action.
- c) Any form of drug, with the exception of prescribed drugs, is consequently totally banned on board Company vessels/MOUs.
- d) Personnel on prescribed drugs must inform the Master/OIM/Diving Supervisor upon joining or upon prescription during service on board, If the Master/OIM/Diving Supervisor is on a prescribed drug, he will declare this to the Company prior to joining the vessel/MOU, or upon prescription during the period of service on board.
- e) Have a responsibility to the company, their fellow employees, their subordinates and the general public to ensure that everyone in the workplace complies with this policy.

The company shall, from time to time, conduct unannounced searches for drugs and/or alcohol on its owned or controlled property (both shore-side and vessels/MOUs). The company may require employees to submit to medical evaluation, or drug and alcohol testing, where the use of drugs or the abuse of alcohol is either obvious or suspected. In the case of any serious accident, timely testing shall be carried out in the course of the investigation.

At no time shall any employee be allowed to perform assigned duties while under the effect of alcohol or drugs. All employees shall be subject to random and probable cause testing and inspection by the company in our effort to enforce this policy. This responsibility will be supported by a system of random alcohol testing, whereby respective Port Captain/Port Engineer/Company Representative carry out random tests either on specific individuals or on full crews. Results will be formally recorded. Shore staff may be tested on a random basis by the HR Manager and site safety officer, as considered appropriate.

## STOP WORK POLICY

It is the policy of the Company that:

- a) All Company employees and contractors operating within the Company work sites ashore and offshore have the authority and obligation to stop any task or operation where the controls of risks from hazards to Safety Health and Environment are not clearly understood, or concerns about any of the control measures exists.
- b) No work shall resume until all “Stop Work” concerns and questions have been adequately addressed and resolved.
- c) The Company’s Management will not tolerate any form of reprisal or intimidation directed at any individual for exercising their authority as outlined in this policy.

The Company’s Senior Management is committed to creating a culture where “Stop Work” is exercised freely, monitor the compliance with the policy and resolve “Stop Work” conflicts.

It shall be the responsibility of every person in supervisory position to:

- d) Create and continuously strengthen the culture within their respective departments where the authority of “Stop Work” is exercised freely.
- e) Acknowledge proactive participation and ensure that all “Stop Work” actions are properly reported with required follow-up completed.

It shall be the responsibility of ALL Company employees and contractors to initiate a “Stop Work” intervention when warranted, to support the intervention of others and properly report all “Stop Work” actions.

## PPE POLICY

It is the Company's policy to provide to all employees the appropriate PPE required for performing any work within the company's work sites.

PPE to be used shall be identified in the relevant Risk Assessment.

In accordance with hierarchy of controls the Hazards representing a Risk shall be removed/eliminated, or the Risk reduced to as low as practicable whenever possible by engineering and administrative controls before PPE has been employed.

PPE is the least desirable way to control risks and should not be used unless other controls have been exhausted, in accordance with the "Hierarchy of Controls"

As a minimum head, eye and foot protection as well as a suitable coverall shall be worn by all personnel while boarding, disembarking, standing, or working outside of accommodation spaces of a Company ship and shore-based work sites at all times.

In case of any contagious diseases outbreaks all employees are responsible to use the PPE as required to stop/minimize the spread

All employees are responsible to ensure

- The PPE in use is fit for the job, fit for the purpose and fit for the person.
- Donning the PPE properly
- Cleaning and maintaining the PPE as per instructions from manufacturer for reusable PPE

Informing the Master/HOD/supervisor if the PPE need to be repaired or replaced

## TRAVEL SAFETY POLICY

The Company is committed to the goals of significantly reducing road traffic, air travelling injuries and fatalities and achieving world class safety performance.

The Company believes that this can be advanced by the implementation of a number of sound driving practices, namely:

- a) Personnel should be made aware that land transport safety is as important as other business objectives and that transport incidents are avoidable.
- b) Personnel should strive continuously for improvement in land transport safety performance by minimizing risk.
- c) The promotion of openness and the participation of all individuals in improving safety performance should be actively encouraged.
- d) There should be a commitment to meet all legislative requirements and to apply responsible standards and procedures where national regulations do not exist.
- e) The requirement for land transport should be challenged and consideration given to alternatives to reduce the consumption of fuel, emissions and discharges.
- f) All transportation operations should be undertaken with proper regard for the environment and a striving to reduce the consumption of fuel, emissions and discharges.

Additionally, following points must be understood / complied with when travelling:

### **Air Travel**

- a) Do not consume alcohol before, during or after a flight.
- b) Consume water or fruit juice before, during and after your flight.
- c) Remember when travelling to or from home, you are representing the company and as such, your behavior reflects on the company.
- d) When joining a vessel/MOU after a long period of travel time / passing through time zones etc., the Master and Chief Engineer should endeavor to get a sufficient rest before taking command of the vessel/MOU. In such cases, the outgoing Master and Chief Engineer should not complete the handover until they are satisfied that their relief is adequately rested and fit for work responsibilities following their journey.
- e) Luggage allowances should always be checked before travel to ensure that no penalties for excessive baggage will be charged.

### **Road Travel**

- a) All company personnel operating a company car or hire car must obey by the local traffic laws and speed restrictions.
- b) Seat belts must be worn at all times.
- c) Mobile phones and/or electrical devices should not be used when driving a vehicle. If such use is required, you should stop at the next safe place to place or take a call. This includes text messages and emails.
- d) All company vehicles should be kept in good condition.
- e) If hiring a car. Please ensure you check that it is in a good condition and there are no obvious defects with the steering/breaking systems etc.

These practices are also applicable when the Company utilizes processes for pre-qualification of land transportation service providers and other contractors. The Company considers that demonstration of performance delivery against these practices is of critical importance in the Contractor and sub-Contractor pre-qualification assessment.

## SMOKING POLICY

The Company believes that all personnel on board our Vessels/MOUs and in all Company's sites who do not smoke have the right to breathe smoke-free air.

This policy aims to establish a non-smoking environment in our workplaces to promote health and to prevent tobacco related diseases. The only exceptions will be "Designated Smoking Areas," specifically set aside for smokers.

Objectives:

- a) To encourage and to promote non-smoking as the normal practice for the benefit of all.
- b) To increase awareness of the damaging effects of smoking on health and the benefits of not smoking.
- c) To ensure that all staff appreciate that the effective implementation of the policy is a matter of individual behavioral responsibility.

Smoking is forbidden in all areas except in those designated by the appropriate signs.

These "Designated Smoking Areas" are to be clearly marked and must be provided with adequate ventilation. They should be located such that smoke cannot infiltrate the smoke-free areas. An example of a Designated Smoking Area might be the bridge, always subject to the Master's/OIM's agreement.

Smoking is not permitted in any area where food is designated to be consumed or prepared, or in any sleeping quarters, especially due to the inherent fire risk.

It is the responsibility of all personnel to implement this policy and to make all new personnel and visitors aware of the contents.

The Designated Smoking Areas shall be determined on site by those senior personnel working on the site and they shall not be compromised.

## INFORMATION TECHNOLOGY & CYBER SECURITY POLICY

The Company's management information environment is comprised largely of proprietary computer hardware and software systems, complemented by tailor-made software solutions, which address the Company's particular operating requirements.

The Company Management recognizes the fundamental risks to the safe ship operation through cybercrime and the need for regulation and those for the expansion of the own ISM management objectives

It is the Company's policy that all information should be treated as being of the highest confidentiality and available only to the Company's employees. Particular emphasis is placed on the confidentiality of Client information. Accordingly, access to the Company's information data base is strictly controlled.

The Company aims to safeguard assets, guide personnel and their actions, and allow freedom of action and of decision making within the boundaries of the system, avowing interference from both internal and external influences through the application of Cyber security methods.

In order to achieve these aims, The Company has put in place security and back-up systems, which demonstrate the Company's commitment to the preservation of its information technology systems and data.

The Management also ensure that the systems in use are designed, architected, engineered, built and operated with appropriate due care and due diligence to ensure the Cyber security.

Company Identify the Cyber Security hazards, the critical systems and ensure protection, detection, response and restore measures are in place.

The Company ensures that all employees are familiarized and understand the ICT & Cyber Security measures and other controls in order to use and protect systems, data, and asset functions.



## SECURITY POLICY

It is the policy of the Company to provide a secure working environment, by establishing and maintaining the required security measures to prevent unlawful acts against shore based work sites, Vessels, MOUs, Diving Sites which endanger the safety and security of persons and property and continuously promote a secure working environment both ashore and onboard managed vessels/MOUs.

Company objectives are to:

- a) Provide security procedures and practices for all on shore and offshore operations to protect the security of ports and the wider community.
- b) Establish safeguards to reduce the risk to shore based personnel, offshore vessel's/MOU's crew, Diving Team passengers, port personnel, company property and community.
- c) Comply with Local, International statutory, legislative and class requirements as applicable.
- d) Improve the security skills and awareness of company personnel ashore and onboard ship.
- e) Prepare contingency measures for emergencies relating to possible security incidents.
- f) Ensure fast and efficient exchange of security related information.

These objectives will be achieved by:

- g) A Ship Security Assessment and a Ship Security Plan specific to each individual ship.
- h) Comprehensive training for company personnel.
- i) Actively promoting security awareness amongst company personnel.
- j) Regular documented reviews and internal audits of security procedures and plans, in order to allow for constant update and improvement to the plan.
- k) Prevents unauthorized access to managed vessels/MOUs and shore-based premises.
- l) All employees are expected to comply with the required procedures within the ship security plan and should be familiar with the relevant security duties required of them and the measures required protecting the ship from any unlawful act.
- m) Prepares & trains shore based and sea going personnel for handling emergency situations.

The company shall ensure that the Company Security Officer, the Master/OIM and the ship security officer are given the necessary support to fulfil their duties and responsibilities.

All Company employees, shore based and sea going is responsible for implementing the company's Security Policy.

The Company's Management is responsible to monitor and review the Security Policy on a regular basis in order to ensure that it remains relevant and effective. As evidence of Management's commitment on the implementation of the above that policy is to be posted at prominent positions both at Company's premises and onboard managed vessels/MOUs.

## RISK MANAGEMENT POLICY

The Company aims to use risk management to take better-informed decisions and improve the probability of achieving its strategic and operational objectives.

The Company is committed to the creation of long-term stakeholder value by implementing a sound system of effective risk and control management. Understanding the material risks the Company faces and appropriately managing these risks enhances the Company's ability to make better decisions, deliver on objectives and improve performance. This includes the provision of a safe and healthy work environment for all employees and for contractors and others at the Company sites and offices. The Company recognizes its legal and moral obligation to provide and uphold as far as practicable a workplace that is safe and without risk to the health of employees, contractors and others.

This policy is a statement of the overall approach to risk management for the Company. The ultimate purpose of risk management is to successfully undertake our work in a way delivers sustainable value for stakeholders and effectively manages workplace risks and hazards

The policy applies to all activities and processes associated with all operations of the Company.

Risk is an inherent aspect of all commercial business activities. Risk management principles must become part of routine management activity across the Company. The key objective of this policy is to ensure that the Company has a consistent basis for measuring, controlling, monitoring and reporting risk across the Company at all levels.

### Objectives & Implementation

- a) To confirm and communicate the Company commitment to risk management to assist in achieving its strategic and operational goals and objectives.
- b) To formalize and communicate a consistent approach to managing risk for all the Company activities. To ensure that all significant risks to the Company are identified, assessed and where necessary treated.
- c) To assign accountability to all staff for the management of risks within their areas of control.

Risk management forms part of strategic, operational and line management responsibilities and are integrated into strategic and service planning processes.

Risk management is embedded in all policies and procedures, with workers contributing to risk management systems.

## MOBILE PHONE POLICY

It is the responsibility of the Master/OIM to enforce this policy on board his vessel/MOU to ensure a safe work environment.

Whilst on duty, the private use of mobile phones, tablets and any other electronic device, which includes but not limited to the following are prohibited whilst carrying out any task including drills, exercises and training.

- a) Conversations
- b) Texting (including WhatsApp etc.)
- c) Emailing
- d) Skype / Facetime
- e) Internet Browsing
- f) Social Media (Facebook / Instagram etc.)
- g) Gaming
- h) Listening to Music

Mobile phones should not be carried on your person; they should be stored in your cabin only.

Any use of a mobile phone whilst on duty or watch, but not when engaged in any task, will be limited to company business only.

Permission for emergency personal use must be obtained from the Duty Officer.

## JUST CULTURE POLICY

Company is committed to promote the culture where staff are not punished for actions, omissions, or decision taken by them that are commensurate with their experience and training but where gross negligence, willful violations and destructive acts are not tolerated.

The Management is committed to provide all necessary resources and trainings that the employees will have the competence to undertake the task to improve the HSE Culture in their workplaces.

A Just Culture Policy sets to seek the improvement of the organizational culture and the performance of company by modifying behavior, encouraging the sea fares and other employees to take the personal responsibility with accountability for their action and rewarding behavior exceeding expectation

The policy also sets out the expectations for adherence to Company SHEQMS in all workplaces and provides a context for enforcing the system.

The Policy also ensures to provide the processes for managing behavior that fall below expectation in a transparent and fair manner.

To achieve this goal, it is imperative to have uninhibited reporting of all accidents, incidents, events, hazards, risks and other information that may compromise the safe conduct of Company operations.

To this end, all employees are responsible for, reporting any SHEQ related information.

1. Reporting is free of any form of reprisal. The main purpose of reporting is for risk control and accident and incident prevention, not the attribution of blame.
2. No action will be taken against any employee who discloses a SHEQ concern/information through the reporting system, unless such disclosure reveals, beyond any reasonable doubt, an illegal act, gross negligence, a deliberate or willful disregard of regulations or procedures.
3. Our method for collecting, recording, and disseminating safety information guarantees the protection to the extent permissible by law, of the identity of those who report SHEQ information.
4. Company will provide employees full support during any external investigation

Company consider Just Culture as one of the keystone to create the organizational Safety Culture in line with SSHEQMS

## SHORT SERVICE EMPLOYEES / NEW JOINERS AND VISITORS POLICY

The Company Management is committed to provide a safe and healthy working condition considering the purpose, size and context of the organization and considering the risks and opportunities and the achievement of its SSHEQ Policy.

Company is committed to safeguard all short service employees, new joiners, and visitors with no worksite specific experience in all its undertakings.

The Policy aims to set additional measures to be adopted on all short service employees, new joiners, and visitors with no worksite specific experience. It will be the Worksite Manager's / Master's responsibility to ensure full compliance of this Policy and report any non-compliance of the same.

All short service employees, new joiners, and visitors with no worksite specific experience shall be required to keep the (short service employees, new joiners, and visitors) identification card on, for a period of 3 Months starting from Joining date. This is to identify these personnel to others as personnel who are under familiarization with the worksite's rules and standards.

Application:

- All Worksite Managers / Master's to maintain stock of the Identification Cards.
- All Worksite Managers / Master's to ensure that the Short Service Employee / New Joiner / Visitor is wearing the identification card at all times.
- Worksite Managers / Master's to maintain a log of Short Service Employee / New Joiner / Visitor.
- Upon completion of 3 Months' time the Personnel no longer need to wear the identification card.
- All staff to extend full support to any person wearing the identification card.

## ENVIRONMENTAL PROTECTION & SUSTAINABILITY POLICY

*ZMI Holdings believes that to be successful over the long term, creation of value for Society and our Stakeholders, based on the principle of sustainable activities and processes is paramount. We act today to secure our future. We go beyond compliance and ensure that we use resources efficiently to mitigate all environmental risks in our operations, and lower vessel emissions.*

ZMI Holdings is based on the philosophy of caring for our planet. The company environmental policy has always preceded local & International regulations. This core value is consistent with the business philosophy and requirements of our clients, and we work for environmental protection.

This policy is developed in consideration of three interconnected crises, climate change, biodiversity loss and pollution. These crises are putting global economic and social well-being at risk. They undermine opportunities to reduce poverty and improve lives, and they complicate the response to the Pandemic crisis.

Company remains as one of the leading offshore Marine companies and having the ambition to move even faster to catch up with the Paris climate goals. Currently, Company is using all available techniques to meet the IMO regulations. Improving fuel efficiency, switching to very low Sulphur fuel oil and ship design have potential and are the first focus for ZMI Holdings for new units.

ZMI Holdings observe all international and local environmental protection conventions. We are committed to preventing pollution, saving energy and carbon reduction, and protecting the earth. Strict standards and procedures with supported plans and programs are set for environmental protection and pollution prevention. The Company also encourages all employees to report any non-compliance and follow all plans, programs in a responsible manner in order to prevent pollutions and minimize risks to the environment.

We are also committed to catch up the Climate goals sets in Paris; Glasgow agreement and Seventeen Goals sets by UN (as applicable) with corporate level approach and stay as leader in this area too.

Company set plans, programs and made the action plan which consist short, medium and on long term basis and sets the broad based KPI for all departments and in particular for operations and technical divisions to meet the IMO and other requirements including our reputable partners and clients.

We also make use of the latest marine technologies to reduce the carbon footprints and doing everything we can to protect the marine ecology and the happiness of mankind.

To achieve this policy the Company established a SSHEQ Management System to comply with the IMO requirements. The Company and vessels owned and/ managed or on bare-boat chartered basis, got valid DOC's (ISM certifications) and IOPP, IAPP by classification societies, Administration and in process to obtain ENVIRO notation as applicable and shall perform IHM for new units.

All employees whether on Marine, Engineering, and other Departments (onboard & Ashore) shall observe this policy at all times that will enable the Company to comply with this policy and support them to be fully skilled to follow their duties in a responsible manner in order to prevent pollutions and minimize risks to the environment.