

# COMPANY'S POLICY STATEMENTS

## FLEET ANNOUNCEMENT

### 1. HUMAN RIGHTS AND HUMAN RESOURCE POLICY

The company and its management board are committed to support and to protect the International Bill of Human Rights within their sphere of influence and throughout their business activities. The company actively participates in the United Nations Global Compact.

All employees both on board and ashore shall be treated in a fair, just and correct manner, based on relevant international and national rules and regulations and applicable working terms and conditions.

The company and its management board do neither permit nor tolerate but will prevent any kind of discrimination and harassment of their employees on board or ashore on the grounds of race or ethnic origin, gender, religion or belief, disability, age or sexual orientation.

The company demands and expects from its employees that each individual shall carry out the work he or she is hired for in a responsible, professional and skilled manner and do their utmost to encourage and create a human, healthy, safe, and secure working environment.

### 2. QUALITY POLICY

It is the declared corporate self-conception of the company to continuously improve the performance of its entire business activities as a ship managing company for dry cargo vessels. This shall promote the aim of the company to be valued by its external and internal stakeholders for an economical, ecological and social responsible and sustainable business conduct, for highest service quality and reliability as well as for highest safety and security standards.

The company wants to develop its human and technical resources and systems in order to continuously increase the quality of services, productivity, profitability and environment protection.

The employees working in the company are regarded as a resource of high value, helping to achieve the company's goals. They shall be committed to quality, reliability and expertise.

The vessels shall be kept well maintained in a good and efficient condition, i.e. to comply with

class and mandatory requirements. All resources necessary for this purpose will be ensured by the company.

The owners shall receive all necessary information regarding the fulfilment of the management contract and any deviations from agreed standards or budgets.

Each employee shall positively support these aims and perform his or her tasks and responsibilities in a most professional way and in accordance with all applicable national and international rules and regulations as well as with all voluntary regulations with regard to quality, safety and environmental protection to which the company has subscribed.

Each employee shall inform the company about any possibility or need for improvement of day-to-day business, service or organizational subjects.

### 3. HEALTH, SAFETY AND ENVIRONMENTAL PROTECTION POLICY

The company will assess all identified risks to its own and third party's personnel, vessels, cargoes, to any other own or third party's property and to the environment and establish appropriate safeguards aiming at the elimination of hazards, in order to ensure that no unacceptable or avoidable risks are taken.

The company is aiming for an accident free operation of all vessels which includes a zero-pollution and a zero-incident strategy. The company is committed to provide safe and healthy working conditions for the prevention of work-related injury and ill health. The company is further committed to continuously improve the occupational health, safety and environmental management system and by regularly reviewing its performance and setting objectives to continuously improve the performance.

To achieve these objectives the company issues instructions complying with mandatory rules and regulations - compliance with all applicable legal and other requirements is one of our core commitments. Applicable codes, guidelines and standards recommended by the IMO, administrations, classification societies and maritime industry organizations are taken into account as well. The instructions shall also ensure the correct handling of the vessels and their equipment as well as the correct treatment of the cargo carried, in particular dangerous cargo.

The company will employ qualified staff and continuously improve their skills and abilities, including preparing for emergencies, related to occupational health, safety and environmental protection.

Safe practices in all ship operations are laid down in the respective Management System procedures. Together with a safe working environment,

where each employee takes the responsibility for his / her own and others safety, they are the safeguard against all identified risks. All staff shall conduct their duties in such a way, that these objectives are ensured. The company will provide all necessary resources to achieve afore mentioned objectives.

All staff is invited, entitled and strongly encouraged to participate in the management of Occupational Health & Safety risks by reporting identified non-conformities related to the Management System and any applicable international or national laws, rules or regulations and to make proposals for the improvement of the system to the Designated Person.

All employees of the company ashore and on board shall have the authority and responsibility to intervene and discontinue a job execution ("STOP THE JOB") in the event that may be potentially dangerous or hazardous to the safety of the ship or her crew, to the health or to the environment without fearing unjustifiable dismissal or other unjustifiable action by the ship owner, charterer or any other person that has the authority over the operation of the ship, as consequence of the proper exercise of his professional judgment and duties.

The company provides an internal designated Whistle-Blowing-Hotline to all employees. This Whistle-Blowing-Hotline is the last resort when all other possible means of reporting in-compliances with Company rules and regulations are already exhausted. The company will guarantee that such reports remain anonymous and the personal rights of the reporting individual will be protected.

**4. ENERGY EFFICIENCY  
POLICY**

Zeaborn Ship Management and its management board are committed to make responsible and efficient use of energy on board of all vessels under management, with the purpose of preserving natural resources and reducing emissions of greenhouse gases into the atmosphere. This use of energy resources provided (on board) by third parties and by the company itself is part of a sustainable and future-oriented business strategy of Zeaborn Ship Management.

The management will lead and promote energy efficiency programs and will provide all necessary resources in order to ensure that the principles of this policy are met. Objectives and targets are established and continuously reviewed to measure and improve the energy efficiency performance of the company.

Zeaborn Ship Management actively participates in and promotes further development of

technologies on board of the vessels as well as of the design of its vessels to meet afore mentioned energy performance targets.

The company holds and organizes regular training and education courses for its staff to raise the awareness for the necessity of an excellent energy efficiency performance within all areas of its core business activities. All employees are expected to support and promote this energy efficiency policy and to take over any of their individual responsibilities which may be derived from the respective objectives and targets.

The company further ensures compliance with all legal and other international and national requirements and regulations related to energy consumption and consequential impacts on the environment. All rules are constantly monitored by the company to ensure the timely adaption of any changes.

**5. DRUG AND ALCOHOL  
POLICY**

All sea and shore staff of Zeaborn Ship Management must perform their duties in sober condition. The use of drugs is strictly prohibited. A firm set of rules and procedures has been implemented to ensure and verify that both, routine and emergency duties are at all times carried out in a fully competent and capable manner, unimpaired

by the influence of alcohol and drugs. Regular test schemes including unannounced tests are executed. Any employee in breach of this policy will be subject to immediate disciplinary measures including immediate dismissal. The company will support measures and actions of authorities in relation to criminal offenses in this relation.

**6. ANTI-CORRUPTION &  
BRIBERY**

Zeaborn Ship Management actively works against corrupt practices by constantly focusing on anticorruption measures. We apply relevant international rules and standards and are committed to the eventual elimination of such practices. To combine forces with other stakeholders of the industry, Zeaborn Ship Management is a member of the Maritime Anti-Corruption network and us such strongly supports the vision of the MACN.

Zeaborn Ship Management has established procedures addressing the handling of bribery and any other act of corruption. All employees of the Zeaborn Group – on board and ashore – are requested to strictly adhere to the Code of Conduct and the instructions describing the handling of any corrupt demand.

**7. INFORMATION SECURITY  
POLICY**

The company and its management board are committed to protect the company's information assets by implementing and continuously maintaining an Information Security Management System that defines all necessary processes to identify the information we need to protect and the specific measures to protect it.

It is the Policy of Zeaborn Ship Management to ensure that:

- Information are protected against unauthorized access
- Confidentiality of information is maintained
- Information is not disclosed to unauthorized persons through deliberate or careless action

- Integrity of information is maintained through protection from unauthorized modification
- Availability of information to authorized users is granted when needed
- Regulatory and legislative requirements are met
- Information security training is given to all employees
- All breaches of information security and suspected weaknesses are reported and investigated
- Business continuity plans are produced, maintained and tested on a regular basis



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