

## HEALTH, SAFETY, QUALITY AND SECURITY POLICY

The Company is committed to achieve health and safety performance improvements and conducts its business through this integrated Health, Safety, Quality and Security Policy. In order to achieve its commitment towards this policy, the Company will:

- Strive to achieve zero incidents and no harm to people by establishing procedures to provide for safe practices in ship operations and a safe working environment thereby preventing injuries and ill health;
- Seek customer feedback to measure the effectiveness and drive improvement of the Company's quality management systems;
- Provide a secure working environment for people involved in all its operations worldwide by ensuring compliance with the International Code for the Security of Ships and Port Facilities (ISPS Code) as well as cooperating with international bodies / states in their efforts to deter maritime terrorism;
- Meet or exceed all applicable regulatory requirements related to occupational health, safety and security within the scope of the Company's operations;
- Assess all identified health, safety and security risks for the probability of its occurrence and potential impact to its ships and personnel and establish appropriate safeguards.
- Provide training to continuously improve safety management skills of personnel ashore and on board ships, including preparing for emergencies related to both safety and security;
- Continually improve all its processes by:
  - i. Reviewing this policy annually to ensure its suitability;
  - ii. Encouraging the reporting of best practices, near misses, unsafe acts and unsafe conditions to capture lessons learnt;
  - iii. Monitoring, measuring and reviewing the Health, Safety and Quality performance data against established Company objectives and Company policies, evaluating audit results; and
  - iv. Analysing available records of corrective and preventive actions and management reviews and verifying that the processes are implemented effectively.

All Company employees are to comply with this policy at all times. When appropriate, the Company shall consult both, employees and external parties about pertinent occupational health, safety and security issues during reviews.

The Company will use its best endeavours to ensure that contractors working on their behalf apply standards compatible with this policy. Any changes to this policy affecting contractors shall, where appropriate, be done in consultation with them.

This policy is posted on board and in the Company's premises with the aim to communicate to all persons working under the control of the Company of their individual health, safety and security rights and obligations.

Date: 02<sup>nd</sup> Feb 2016  
Monaco

A handwritten signature in blue ink, appearing to read "Francesco Bellusci", is written over a horizontal line. Below the line, the name "Francesco Bellusci" and the title "Managing Director" are printed in a black, sans-serif font.