

Issued by SAFETY DEPARTMENT	Approved by DPA	Date 10.01.2024	Revision 4	PG 1 OF 7
SAFETY MANAGEMENT MANUAL COMPANY POLICY <i>Reference: IMO Resolution A.741(18) as amended</i>				CHAP. 00 ENG

Phoenix Offshore srl

COMPANY POLICY

1. OBJECTIVES

The Policy refers to the ships managed by the company Phoenix Offshore S.r.l. hereinafter referred to as the Company.

The Company, conscious of its responsibilities, places its utmost commitment to safety and environmental protection, to safeguarding the safety of human life, aiming at the improving of the quality of the provided services and, at the same time, increasing the customer satisfaction and the satisfaction of all interested parties. In particular, the satisfaction of the internal customer is pursued through the moments of verification, while the satisfaction of the external customer is pursued by offering and adapting all the company procedures to his particular needs, implicit and explicit, and constantly monitoring the achievement of the agreed contractual targets.

The company declares that every operation carried out by its own personnel, both ashore and on board the ships, must highlight the commitment to achieve the company's goals targets, here below listed by priority:

1. to prevent the injuries and loss of human lives among the Crew.
2. to preserve and protect the Environmental.
3. to safeguard the health and safety of personnel.
4. to maintain the technical and operational efficiency of the Ships at the utmost level.
5. to protect the ships and their crews from the consequences of illegal practice.
6. to manage the ships and transport the cargo in a safe and efficient manner.
7. to assess all possible risks for the ship, her crew and the environment, and set up adequate preventive measures.
8. The continuous improvement of personnel training, both on board and ashore, including the emergency preparedness involving safety and the environmental aspects.

Health Policy

Company ensures that all activities shall be carried out in safe manner and for the safeguard of the health of the involved personnel.

All personnel must comply with company's regulations and instructions and take all precautions to protect themselves and the other persons they work with.

Company Commitment includes the design, construction and ship's operation.

All workspaces on board are covered.

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Company requires that in case of conflict between economic or commercial matter and the above-mentioned targets, the Master shall give priority to the latter.

To achieve the above-mentioned targets, the Company will provide the necessary resources and the qualified personnel, describes her own organization, identifies specific duties and responsibilities, establish training requirements and coordinate all tasks, in order to:

- making ship operations safe, protecting the environment and the health and safety of the personnel, in compliance with the applicable national and international rules and regulations.
- assess all identified risks for the ships, personnel and the environment and establish the adequate control measures.
- continuously improve the technical and operational competences for on-board and onshore personnel.
- maintain the highest level of training of the crew.
- maintain the highest standards for the maintenance of the managed ships.
- be always ready, both ashore and on board, to face emergency situations, adopting the necessary measures to reduce environmental impacts and to guarantee the health and safety of personnel.
- commit to the continuous improvement, to the prevention of the pollution and all other specific responsibility related to the background of the organization, through the training of the personnel, through the adoption of operational procedures and the technological and organizational choices useful for this purpose.
- ensure the compliance with all national and international rules and regulation and the class conventions and standards.
- constantly monitor the level of the compliance of the system with the appropriate national and international rules and standards industry.
- plan and review the environmental objectives and targets.
- plan and review the targets for the safety and the health of the personnel.
- pursue the constant improvement of the quality of its services, in order to achieve maximum customer satisfaction and the reputation on the market such as to make the Company always competitive.
- apply, where and as appropriate, the relevant industrial standards.
- implement a security and cyber security management system as established by international conventions and by company policies and procedures.

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The Company will inform all the personnel about the specific tasks assigned to them and will require their utmost effort to achieve the aforesaid targets.

HOWEVER, AS FAR AS THE MANAGEMENT AND THE OPERATION OF THE SHIPS ARE CONCERNED, THE COMPANY LEAVES UNCHANGED THE OVERRIDING AUTHORITY OF MASTER, TO ACT OR GIVE ORDERS AS MAY BE DEEMED NECESSARY FOR THE SAFETY OF LIFE, FOR THE SAFETY OF THE SHIP AND FOR THE PROTECTION OF THE ENVIRONMENT, REGARDLESS AS TO COMPLIANCE WITH COMPANY PROCEDURES OR INSTRUCTIONS.

Master also has the responsibility to inform the company immediately in case of any accident or non-conformity of the ship with the relevant standard which can jeopardize the safety of human life and of the ship, or which can cause environmental pollution.

2. TOOLS

In order to achieve the planned targets, the Company will use the following tools:

- an efficient organization on board and ashore to ensure high quality performances of the provided services, the health of the personnel, the safety of human life and the environmental protection
- a "**Safety Management Manual**" in compliance with IMO Resolution 741(18):" Guidelines on Management for Safe Operation of Ships and Pollution Prevention".
- an integrated management system QHSE (QUALITY, HEALTH, SAFETY, ENVIRONMENT), in compliance with ISO 9001:2015 – 14001:2015 – 45001:2018, and subject to periodical review.
- an "external" System of Audit and Certification intended to certify that the organizational structure, the responsibilities, the procedures and the resources put in place for the management of Ships meets the requirements.
- an "internal" System of audit intended to verify as a continual process the effective and efficient functioning of the management system to furnish the elements necessary to correct and/or improve it.
- MLC 2006 (Maritime Labor Convention 2006) guarantees the improvement of Maritime Labor, ensuring to the crews the highest conditions of the hygiene and the health, the highest quality of life on board and the eating nutrition food. At the same time, the convention establishes the control and verification procedures in order to verify the level of compliance with all the rules and standard for the safety and the incident\accident prevention, the minimum manning of the vessel, the employ condition, the fitness evaluation , seafarer agreement , the salary, the work and rest period , the training of the crew , the right to leave, the repatriation and the health care on board / ashore and the social welfare.

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The above-mentioned targets together with the available tools constitute, as a whole, the " **QHSE POLICY** ".

3. CONTRACTORS\CLIENT

While on board the vessel, all contract personnel should work within the vessel's SMS and permit to work system.

The shipboard management is responsible to check any conflicts between the vessel/unit's SMS and contractor\client's requirements.

Furthermore, the client\contractor will provide the Risk Assessment and any safety procedures about the work ongoing, the senior officer must understand the policy and procedures of the client and responsible for the familiarization of all crew and the implementation of the client's requirements.

The senior officers are responsible on addressing any conflicts between the vessel/unit's SMS and charterer's requirements. Between the client and the company requirements the most restrictive procedures and policies will be applied.

While on board the vessel/unit, all crew and contract personnel should comply with the vessel/unit's D and A policy, except if the Contractor's policy is more restrictive.

This would include zero blood alcohol content when boarding the vessel at any time or being in possession at any time while on board.

All documents provided to and received from the client\subcontractors must be in the stipulated working language to ensure the effectiveness of communications, without risking misunderstanding or ambiguity, at all times. This should include information on muster stations, emergency alarms and emergency procedures.

THE SAFE WAY IS THE ONLY WAY

Napoli, 10/01/2024

Sole Administrator

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ACRONYMS

AMVER	Automated Mutual-assistance Vessel Rescue System
ARES	Automated Search and Rescue System
CIRM	International Radio Medical Centre
COLREG	International Convention for the Prevention of Collisions at Sea
DOT	Department of Trade
DPA	Designated Person Ashore
EGC	Enhanced Group Call
ETA	Estimated Time of Arrival
ETD	Estimated Time of Departure
GMDSS	Global Maritime Distress & Safety System
IACS	International Association of Classification Societies
IALA	International Association of Marine Aids to Navigation and Lighthouse Authorities
ICC	International Chamber of Commerce
ICS	International Chamber of Shipping
ILLC	International Load Line Convention
ILO	International Labour Organization

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INMARSAT	International Maritime Satellite Organization
IMO	International Maritime Organization
ISM	International Safety Management
ISO	International Standards Organization
ISU	International Salvage Union
ISPS	International Ship and Port Facility Security Code
MARPOL	International Convention for the Prevention of Pollution from Ships
MERSAR	International Convention on Maritime Search and Rescue
MSC	Maritime Safety Committee
NAVTEX	Maritime Safety Information using Radio Telex
OCIMF	Oil Companies International Marine Forum
P & I	International Association of Protection & Indemnity clubs
PSC	Port State Control (Paris MOU)
RINA	Italian Naval Register
ROB	Remaining on board
SART	Search and Rescue Transponder
SIGTTO	Society of International Gas Tanker & Terminal Operators
SMS	Safety Management System

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SOLAS	Convention for the Safety of Life at Sea
SOPEP	Shipboard Oil Pollution Emergency Plan
STCW	Seafarers' Training, Certification and Watchkeeping code
MANUALE	Safety Management Manual
RESAL	Ship Safety Officer
RASAL	Ship Safety Representative
DL 271/99	Executive Order 27 July 1999 no. 271
IPSEMA	Maritime Institute of Social Security
SANIMARE	Maritime Health Office
SASN	Medical Assistance Service for Seafarers