



SSM Company Policies



SIEM Ship Management operates in accordance with a set of integrated policies that define our approach to quality, safety, environmental protection, ethical conduct, compliance, and responsible business practices.

These policies collectively form the foundation of our governance and sustainability framework and apply to all personnel, as well as to contractors, suppliers, and other parties acting on our behalf. They reflect our commitment to operating safely, ethically, and in compliance with applicable legal, regulatory, and industry standards.

The summaries below provide an overview of the key principles guiding our operations and our expectations towards business partners. Detailed internal procedures and controls support the implementation of these policies as part of our Integrated Management System.



QUALITY, HEALTH & SAFETY POLICY

SIEM Ship Management is committed to delivering ship management services that consistently meet or exceed customer expectations as well as applicable legal and industry requirements. Our priority is to ensure the efficiency, safety, and full operational readiness of managed vessels, in compliance with Flag State, Classification Society, and regulatory requirements.

We are dedicated to providing a safe and healthy workplace, preventing injury and ill health, and continually improving the effectiveness of our Integrated Management System. Potential hazards and risks are systematically identified, assessed, and mitigated through effective control measures, supported by the provision of appropriate safety equipment and personal protective equipment.

Quality and safety are integral to our daily operations. We foster a culture in which all personnel — ashore and at sea — are empowered to perform their duties right the first time and every time. Continuous improvement is achieved through the active participation of both shore-based staff and seagoing personnel. Our management systems are designed to meet the requirements of ISO 9001:2015, ISO 45001:2018, and the ISM Code, ensuring high standards of quality, occupational health, and safety performance.

Compliance with this policy and related procedures and instructions is required of all personnel and all persons acting on behalf of the Company. Management fully supports all efforts to implement and uphold these principles.

Meeting customer expectations, maintaining safety, and promoting a healthy working environment are fundamental to the Company's long-term success.

ENVIRONMENTAL PROTECTION & ENERGY CONSERVATION POLICY – SUMMARY

SIEM Ship Management recognizes that shipping activities have a direct impact on the marine environment and that changing climate conditions may affect the sustainability of maritime operations. Our policy is therefore focused on delivering high-quality ship management services while preventing pollution, conserving natural resources, and improving energy efficiency.

We are committed to minimizing environmental risks through the continual improvement of our Integrated Management System and full compliance with all applicable environmental, energy efficiency, and regulatory requirements. Environmental and energy objectives are established, monitored, and regularly reviewed to ensure measurable progress.



Environmental awareness and energy efficiency are actively promoted among all personnel. These principles are also incorporated into procurement and technical decision-making processes, including vessel design and equipment selection wherever feasible. Operational efficiency is supported through proper maintenance of main and auxiliary engines, reduction of fuel and oil consumption, elimination of leaks, and compliance with MARPOL Annex VI requirements to reduce atmospheric emissions.

Environmental protection and responsible energy use are embedded in the Company's procedures and daily operations. We believe that responsible stewardship of air, land, and water resources, combined with continuous improvement, supports sustainable economic development and long-term value for employees, customers, suppliers, and stakeholders.

Our management systems comply with the requirements of ISO 14001:2015, ISO 50001:2018, and the ISM Code.

This policy applies to all personnel and all persons acting on behalf of the Company.

We believe that protecting the environment and conserving energy is everyone's responsibility.

BUSINESS ETHICS POLICY

SIEM Ship Management conducts its business in accordance with the highest standards of integrity, professionalism, and ethical behavior. Ethical conduct is a fundamental part of our operations and is based on mutual trust between the Company, its personnel, and business partners.

Operating in a multinational environment, we recognize cultural differences in the perception of business ethics. Nevertheless, SIEM Ship Management applies uniform ethical standards worldwide, ensuring consistent, responsible, and lawful conduct across all operations, both ashore and at sea.

All persons acting on behalf of the Company are expected to act responsibly, loyally, and in the best interests of SIEM Ship Management. Company property, resources, and information are to be used responsibly and solely for legitimate business purposes.

We are committed to conducting our business free from corruption, bribery, and improper influence, and all business relationships are carried out in a transparent, fair, and lawful manner.



Compliance with this policy is required of all personnel and all persons acting on behalf of the Company.

We believe that ethical conduct is the foundation of trust, reputation, and long-term business success.

SEXUAL HARASSMENT POLICY

SIEM Ship Management is committed to providing a working environment in which all individuals are treated with dignity and respect and are able to perform their duties free from harassment, intimidation, or discrimination.

Sexual harassment is not tolerated in any form. Any conduct, behavior, comment, gesture, or physical contact of a sexual nature that may cause offence, humiliation, or create an intimidating, hostile, or uncomfortable working environment is unacceptable.

SIEM Ship Management expects all personnel and all persons acting on behalf of the Company to maintain professional behavior at all times and to treat colleagues, partners, and stakeholders with respect.

This policy reflects the Company's commitment to equality, fairness, and a safe workplace for everyone.

Compliance with this policy is required of all personnel and all persons acting on behalf of the Company.

We are committed to maintaining a workplace free from sexual harassment.

SANCTIONS COMPLIANCE POLICY

SIEM Ship Management is committed to full compliance with all applicable national and international economic and trade sanctions. Sanctions compliance is an integral part of the Company's risk management and decision-making processes.

We conduct our business in accordance with sanctions regimes imposed by relevant authorities, including the United Nations, the European Union, the United Kingdom, the United States, and other applicable jurisdictions. Sanctions considerations are assessed in all new contracts and business relationships in order to reduce legal, financial, and reputational risks and to protect the integrity of our supply chain.



SIEM Ship Management applies appropriate due diligence and monitoring measures to ensure that its operations, counterparties, and transactions do not involve sanctioned parties, jurisdictions, or activities.

Compliance with applicable sanctions is required of all personnel and all persons acting on behalf of the Company.

We believe that strict sanctions' compliance is essential to responsible, lawful, and sustainable maritime operations.

WHISTLEBLOWING POLICY

SIEM Ship Management is committed to conducting its business with honesty, integrity, and accountability. The Company promotes a culture of openness in which concerns regarding unlawful, unethical, or improper conduct can be raised responsibly.

SIEM Ship Management maintains mechanisms that allow concerns relating to misconduct, legal or regulatory breaches, health and safety risks, environmental harm, financial irregularities, or other serious wrongdoing to be reported and addressed appropriately.

The Company is committed to ensuring that individuals who raise concerns in good faith are treated fairly and that such concerns are handled confidentially and responsibly.

This policy forms part of SIEM Ship Management's broader governance and compliance framework and applies to all personnel and all persons acting on behalf of the Company.

We believe that speaking up is essential to maintaining trust, accountability, and responsible business operations.

ANTI-BRIBERY & ANTI-CORRUPTION POLICY

SIEM Ship Management is committed to conducting its business with integrity, transparency, and in full compliance with all applicable anti-bribery and anti-corruption laws and regulations. The Company applies a zero-tolerance approach to bribery, corruption, and any form of improper influence in all its business activities and relationships.

This Anti-Bribery and Anti-Corruption Policy is implemented and enforced through SIEM Ship Management's existing governance framework, including in particular the Business Ethics Policy, Conflict of Interest Policy, Sanctions Compliance Policy, and



Whistleblowing Policy. Together, these policies establish clear standards of ethical conduct, transparency, and accountability.

All personnel and all persons acting on behalf of the Company are required to conduct business responsibly and lawfully, to avoid offering, giving, requesting, or accepting any improper advantage, and to act at all times in the best interests of SIEM Ship Management.

This policy applies to all personnel and all persons acting on behalf of the Company, including employees, crew, contractors, suppliers, agents, and business partners.

We believe that preventing bribery and corruption is essential to maintaining trust, protecting our reputation, and ensuring sustainable and responsible business operations.

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

SIEM Ship Management is committed to preventing modern slavery and human trafficking in all its business activities and supply chains. Modern slavery, including forced or compulsory labour and human trafficking, is a serious violation of fundamental human rights and will not be tolerated in any form.

The Company operates with a zero-tolerance approach to modern slavery and is committed to acting ethically, transparently, and with integrity in all business relationships. We expect the same high standards from our contractors, suppliers, and business partners.

SIEM Ship Management applies a risk-based approach to its operations and supply chain management, including appropriate due diligence and contractual safeguards, to reduce the risk of modern slavery. We will not knowingly engage in business with any party that fails to comply with applicable laws or these principles.

This commitment applies to all personnel and all persons acting on behalf of the Company.

We believe that respect for human rights and responsible supply chain management are essential to sustainable and ethical maritime operations.