

The policy refers to all the processes of the Company: management, administration, sales, supply, technical and service delivery: **Harbour and deep sea towage services. Transportation of goods by barge. Offshore transport and assistance.** The policy refers to the ships managed by Ocean Koper d.o.o., hereinafter called the “Company”.

The Company, conscious of its responsibilities in this field, pledges its commitment to safety and environmental protection.

The Company established that all operation carried out by its personnel, both ashore and on board, will emphasize its commitment to the following objectives, in order of priority:

- prevent physical injury, professional diseases and loss of life;
- protect the environment, in particular the marine one;
- maintain the technical and operational efficiency of the vessels at the highest possible level;
- protect vessels and crew against illegal practices;
- operate the vessels and transport the cargo safely and efficiently;
- do not enter into enclosed spaces when the vessel is at open sea.

The Company required that whenever a conflict arises between commercial or economic motives and the above points, the Master shall always decide by giving priority to the latter in accordance with the above established order.

To achieve the above mentioned objectives, the Company shall provide the necessary resources and qualified personnel, defining its organization, identifying specific tasks and responsibilities, establishing training requirements and co-ordinating all the tasks in order to:

- ensure the safe operation of the vessels and protection of the environment in compliance with the applicable National and international rules and regulations;
- establish safeguards against all identified risks;
- reduce negative impacts on environment and protect natural resources, promoting energy savings;
- constantly improve the technical and operations training of the personnel both on board and ashore;
- Maintain the highest maintenance standards on all managed vessels;
- always be ready, both ashore and on board, to deal with emergency situations;
- constantly improve its performance about protection of health and safety at work, of its own personnel and all the persons who operate for the Company;
- constantly improve its environmental performance to prevent pollution and to reduce the exploitation of natural resources.

The Company shall inform all the personnel of their specific duties and shall require their commitment to achieve the above – mentioned objectives. The Company shall maintain its commitment to consult workers and to guarantee their participation in decisions which concern their health and safety.

However, it is understood that the Master has the overriding authority to act and give orders for the protection of human life, the safety of the ship and the protection of the environment, whether these complies or not with the procedures and instructions provided by the Company,

The Master is also responsible for immediately reporting the Company any accident or non-conformity which may affect the safety of the personnel or the ship or which may pollute the environment. Adequate personnel and means of communication are provided for this purpose.

The effective implementation of the Company’s policy is regularly reviewed on orders to ensure both that the objectives are achieved and that the procedures and instructions are suitable and effective.

Ocean Koper d.o.o has ZERO TOLERANCE to drug or alcohol use in the workplace.

Therefore possession, consumption, distribution, or being under the influence of alcohol or illegal drugs in any form is strictly prohibited onboard the vessels. By violating this, the employee may lend himself/herself liable to summary dismissal, termination of employment or other disciplinary actions.

“Onboard the vessels” – is additionally defined as:

- The entire length of any given sailing period on a vessel - from signing on until signing off
- Applies equally to any and all persons working onboard the vessels.

On-signers shall not consume any alcohol later than 8 hours prior to signing on the vessel, or in general be under any influence of alcohol or drugs when signing on.

Any employee traveling on company costs or representing the company shall represent the company in a decent and honorable way. Employees shall never be intoxicated or impaired by alcohol or drug when representing the company.

Employees that

- are denied use of public transport, including airlines,
- deliberately or negligently fails to embark as scheduled
- deliberately or negligently fails to use planned travel arrangements,
- do not attend/are not able to follow curriculum of planned training,
- do not attend/are not able to follow planned meetings
- act in a disgraceful or disrespectful manner and thereby damage the company reputation, will lend themselves liable to disciplinary actions, ranging from having to cover all additional costs concerning the incident to immediate dismissal or termination of employment.

The company reserves the right to carry out unscheduled inspections to detect the presence of alcohol or drugs onboard company vessels.

All employees may be subjected to random drug or alcohol testing any place and at any time. Such tests will be carried out by independent personnel and analyzed at a recognized laboratory.

In addition, testing may be carried out after an incident, for any reasonable cause including but not limited to any employee demonstrating suspicious or dangerous behavior.

Refusal of undergoing testing will be considered as a positive test result.

No Company personnel shall possess or consume alcohol in any country where the consumption of alcohol is forbidden by law.

Approved By

(General Manager)