

Health, Safety, Security & Environmental Policy

ASP Ships Group (ASP) is committed to conducting all phases of its business operations in a manner that complies with its legal obligations in respect of promoting a healthy, safe and secure working environment, being environmentally responsible and compliant with all relevant rules and regulations in order to minimise the impact of its operations on Health, Safety, Security & Environment (HSSE).

This will be achieved through the implementation of a fully documented Integrated Management System (IMS) which satisfies the requirements and elements of the current standards of ISO 9001, ISO 14001 and ISO 45001 and the ISM and ISPS Codes.

The key to a successful IMS is the involvement and commitment of our employees and contractors. All employees and contractors are obliged to comply with their own obligations under HSSE legislation and regulations and to take steps within their power and responsibility to seek to ensure ASP complies with its obligations under HSSE legislation and regulations. This commitment requires a thorough understanding of the HSSE aspects of each task that we perform.

ASP is committed to complying with its legal obligations in respect of:

- The prevention of injury and ill health;
- · Zero spills to the environment;
- · Identifying, controlling and eliminating HSSE risks along with any legal and other requirements;
- Encouraging open communication amongst all ASP employees, clients, suppliers, contractors and regulators, regarding our IMS standards, procedures and performance;
- Conducting a periodical internal review process through auditing to demonstrate continuous improvement in the company's HSSE performance;
- Provision of Goals and Objectives and Key Performance Indicators;
- Senior Management shall provide the appropriate training and the provision of resources for the implementation of our IMS procedures which will result in a reciprocal commitment from our employees and contractors;
- Conducting our operations, in a manner that safeguards the natural environment and the health and safety of our employees and contractors;
- Maintaining and sustaining a full emergency response capability;
- · Diligently striving to monitor and continuously improve the effectiveness of our IMS; and
- Clearly identify the relevant HSSE representatives both seagoing and ashore, such that they can fulfil their duties in accordance with the ISM Code, ISPS Code, ISO 9001, ISO 14001, ISO 45001, Flag State Regulations and Maritime Legislation.

Any hazardous condition, security breach, unsafe practice/procedure and any inappropriate behaviour shall be immediately reported to the line Manager. Senior Management shall take prompt action to correct the identified issue or condition and take the appropriate steps to prevent any reoccurrence. Employees and contractors are encouraged to continually improve our IMS. The reporting procedures combined with periodical audits, will promote continuous improvement in our HSSE processes and performance.

ASP expects its employees and contractors to take responsibility, a leading role in the promotion of a healthy wellbeing, a commitment to a safe & secure working environment, the protection of the marine environment, along with conservation of energy, to protect the vessel from any unlawful act, to safe guard themselves and to ensure that their actions, either by example, behaviour or instructions do not put others or property at risk. All employees and contractors shall co-operate fully in adhering to this policy and all relevant procedures. Contravention of this Policy may result in disciplinary action including termination of employment.

Authorised B David Borcoski Group Managing Director & CEO Robert Walker Adrian Whatley Group Chief Operating Group Commercial and Officer **Finance Director**

ASP Group Acts as an Agent for Ship Owners, not as a Principal POL-01

Group Commercial and Finance Director 9th January 2023 R8 WE MANAGE SHIPS SAFELY