

	<b>IMS 01 Appendix A</b> <b>HEALTH, SAFETY AND ENVIRONMENTAL POLICY</b>		Issue Status	5 <sup>th</sup> Edition, Rev 1
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**HEALTH, SAFETY AND ENVIRONMENTAL POLICY**

The Company Management recognises the necessity and responsibility, not only to provide competent personnel and well-maintained vessels, but also to promote amongst people working for or on behalf of the company a high standard of safety, health and hygiene and environmental awareness and commitment. It is the Company Management's belief that such awareness and commitment which includes pro-active attitudes towards HSE issues, must start and transcend from the most senior management level downwards through the whole spectrum of the organisation, including shipboard and shore based personnel.

In formulating the HSE Policy, the Company Management has identified clearly the objectives and commitment that are required.

The main objectives of the HSE Policy are appended below which are applicable to all people working for or on behalf of the company.

- To promote safety, hygiene and health and environmental awareness and culture
- To provide a safe, healthy and environmentally friendly working environment
- To prevent injury, ill health and related losses and aim for zero Lost Time Incidents (LTI's)
- To prevent loss of, or damage to property
- To identify vessel, personnel and environmental hazards and mitigate risks
- To provide proper training and supervision for all staff
- To identify, assess and eliminate health and safety hazards and mitigate risks
- To develop and implement HSE Management procedures
- To continuously maintain, review and improve upon the HSEQ IMS and HSE performance
- To prevent pollution and to set objectives and targets to reduce environmental impact
- To achieve "Zero Pollution Incidents" on our vessels
- To ensure workers' consultation and participation in continual improvement of the IMS
- To ensure full compliance with the requirements of all mandatory rules and regulations
- To ensure compliance with applicable codes, guidelines and standards recommended by the IMO, ILO, Flag State and local Legislation, Classification Societies and Maritime Industry.

The Company Management has therefore endorsed a complete and comprehensive HSEQ Integrated Management System Manual (IMS) that clearly identifies in detail the procedures and measures required to achieve these objectives. The IMS Manual also stresses the importance of giving a high priority and compliance to clients own rules, regulations and standards.

This IMS Manual will be kept under constant review for continual improvements and revised accordingly in line with new/changed regulations, Company initiatives and to meet or exceed Client expectations.



Signed: \_\_\_\_\_

**DANNY CHONG**  
 Head of POSH Fleet Services

Date: 15th Sept 2020

	<b>IMS 01 Appendix B DRUG AND ALCOHOL POLICY</b>		Issue Status	5 <sup>th</sup> Edition, Rev 2
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### **DRUG AND ALCOHOL POLICY**

The Company's Drug and Alcohol Abuse Policy applies to all personnel who may work ashore, sail on, or visit the Company's vessels and embraces the principles set forth in the Oil Companies International Marine Forum (OCIMF) "Guideline for the control of drugs and alcohol aboard ships".

The Company recognises that alcohol, illicit, prescription and other drugs, and controlled substances can cause impairment and affect an individual's performance, safety and productivity. The Company is committed to a workplace that is free from impairment induced by any substance, which includes but is not limited to drugs and alcohol.

## **The Company has Zero Tolerance Policy towards the use of Drug and Alcohol (Zero Blood Alcohol Content & Zero Drug Content)**

To achieve this, the Company commits to: -

- Comply with all applicable statutory legislation, regulations, standards and any other requirements to which the Company subscribes.
- Prohibiting the consumption, soliciting or possession of illicit substances, and the consumption or soliciting of alcohol in the workplace.
- Prohibiting any personnel, whether shore-based or seagoing, from bringing alcohol or illicit drugs on board Company vessels.
- Ensuring compliance with this policy which may include but is not limited to drug and alcohol testing of seagoing and/or shore-based staff during pre-employment, periodical medical assessments, post-incident testing, for cause, random or blanket testing.
- Ensuring that all prescription medication that may impact on an individual's ability to perform required duties must be declared to the relevant Supervisor.
- Ensuring that it does not employ any persons who are users of or have a recent record of the use of illegal drugs or have abused the use of prescribed drugs.
- The Company reserves the right to initiate disciplinary action as necessary for any violation of this policy.



Signed: \_\_\_\_\_

**DANNY CHONG**  
Head of POSH Fleet Services  
15th Dec 2020

Date:

	<b>IMS 01 Appendix C SMOKING POLICY</b>		Issue Status	5 <sup>th</sup> Edition, Rev 1
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**SMOKING POLICY**

Smoking on board Company vessels is permitted in designated smoking areas (as designated by the Master), except under the circumstances as mentioned below.

The Master should also, in consideration of non-smokers, ensure that there is no smoking outside of the designated smoking areas.

There is no smoking allowed during operations where there is a hazard of fire or explosion, such as:

- Receiving or transferring fuel, oil, or other volatile liquids.
- Handling any type of flammable materials: in or around paint lockers.
- During emergency drills.
- When moored or mooring alongside docks, piers, rig platforms or other installations where smoking is prohibited.
- Any circumstance where there is a risk of fire.
- Where local Policies, Procedures or Working Practices prohibit smoking.
- When the vessel is within a 500 metre safety zone

The Master is also responsible for implementing and upholding this policy, although all other Officers and Crew Members share in this responsibility.



Signed: \_\_\_\_\_

**DANNY CHONG**  
Head of POSH Fleet Services

Date: 15th Sept 2020

	<b>IMS 01 Appendix D STOP WORK POLICY</b>		Issue Status	5 <sup>th</sup> Edition, Rev 1
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**“STOP WORK” POLICY**

# “STOP WORK” POLICY

Everyone has the Authority,  
Responsibility and Duty to

## STOP THE WORK

If there is any doubt about the safety  
of the personnel, environment or  
operation



Signed: \_\_\_\_\_

**DANNY CHONG**  
Head of POSH Fleet Services  
15th Sept 2020

Date:

	<b>IMS 01 Appendix E NAVIGATION POLICY</b>		Issue Status	5 <sup>th</sup> Edition, Rev 1
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### NAVIGATION POLICY

The Company Management recognises the necessity and responsibility, not only to provide competent personnel and well-maintained vessels, but also to promote amongst its employees, a high standard for navigation safety, awareness and commitment. It is the Company Management's belief that such awareness and commitment which includes pro-active attitudes towards Navigation matters, must start and transcend from the Company management through the Master of the vessel to the Bridge Watch Keeping Team.

In formulating the Navigation Policy, the Company Management has identified clearly the objectives and commitment that are required.

The main objectives of the Navigation Policy are appended below which are applicable to all Bridge Watch keeping team members in our fleet.

At all times when the vessel is at sea or at anchor, the Bridge Watch must be under the control of a responsible, licensed Officer of the Watch (OOW).

The Master or OOW must not leave the Bridge unless properly relieved as per below guidance, but shall not be limited to the following:

- a) in periods of restricted visibility
- b) when there is heavy traffic in the vicinity of the vessel
- c) while underway in restricted waters, inside 500m zone or DP mode
- d) during heavy weather conditions
- e) when entering or leaving port, docking, undocking, shifting the vessel, entering or leaving the 500m zone, when the vessel is in DP mode
- f) during Ship to Ship Manoeuvring
- g) when embarking or disembarking a Pilot or Mooring Master
- h) when anchoring or weighing anchor, mooring operations
- i) during helicopter operations on the vessel
- j) at any other time when the Master judges conditions to be a potential threat to the vessel's safety

The Company Management has therefore endorsed complete and comprehensive procedures that clearly identify in detail the procedures and measures required to achieve the above objectives. The procedures also stress the importance of giving a high priority to and compliance with clients own navigation safety rules, regulations and standards, where applicable.

These procedures will be kept under constant review and revised accordingly in line with new/changed regulations, initiatives and to meet or exceed Client expectations.

All Bridge team members to comply with "No distraction policy" at all times.



Signed: \_\_\_\_\_

**DANNY CHONG**  
Head of POSH Fleet Services

Date: 15th Sept 2020

	<b>IMS 01 Appendix F SECURITY POLICY</b>		Issue Status	5 <sup>th</sup> Edition, Rev 2
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### SECURITY POLICY

The Company Management recognises the necessity and responsibility to, as far as is reasonably practicable, provide a secure working environment for its employees.

It is the Company Management's belief that such awareness and commitment which includes pro-active attitudes towards Security issues, must start and transcend from the most senior management level downwards through the whole spectrum of the organisation.

In formulating this Security Policy, the Company Management has developed and implemented appropriate Shipboard Security Plans and a Port Facility Security Plan in order to ensure compliance with the requirements of the ISPS Code.

For vessels that are not required to comply with the requirements of the ISPS Code, security related procedures and instructions are developed and implemented accordingly.

Project specific security procedures may also be developed and implemented as may be required by the Company and/or the Charterer to address security concerns relating to that particular Project.

All such security procedures must remain confidential and only their requirements made available to the appropriate personnel in order to ensure their compliance.

Seafarers and all other shore-based staffs, including contractors travelling on company business should evaluate security Risk of the country one is travelling to and take necessary precautions.



Signed: \_\_\_\_\_

**DANNY CHONG**  
Head of POSH Fleet Services

Date: 15th Sept 2020

	<b>IMS 01 Appendix G QUALITY POLICY</b>		Issue Status	5 <sup>th</sup> Edition, Rev 1
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**QUALITY POLICY**

The Company's mission is to provide quality service levels that meet or exceed expectations.

The company conducts office based activities related to ship management of a fleet of offshore support vessels and tugs trading worldwide, incorporating the safety and pollution requirements of IMO resolution A741(18), the ISM Code.

The Company is totally committed to achieve the highest management standards in order to satisfy customer requirements and takes into account risk-based thinking (RBT) in planning, review and improvement of the Quality Management System (QMS) and its processes.

There is a constant drive to satisfy requirements, whilst always being mindful of responsibilities to Principals, shareholders, employees and the community.

This involves the active participation, endeavour and ideas of all employees with the aim of continually improving the effectiveness of the Quality Management System.

These high standards are achieved by operating a quality system that meets or exceeds the requirements of the International Quality Management Standard ISO 9001:2015 and all applicable rules and regulations.

As part of its efforts to ensure continual improvement in the quality of services provided, the Company establishes, implements, monitors and achieves measurable quality improvement objectives. Such objectives are reviewed by Management and updated accordingly to ensure continual improvement.

Compliance with this policy, procedures and work instructions is mandatory and binding upon all employees and quality of service is the responsibility of everyone working for and on behalf of POSH Fleet Services Pte. Ltd.

The satisfaction of our Principals and the good reputation of the Company are directly dependent on this working philosophy.



Signed: \_\_\_\_\_

**DANNY CHONG**  
Head of POSH Fleet Services

Date: 15th Sept 2020

	<b>IMS 01 Appendix H</b> <b>DYNAMIC POSITIONING OPERATIONS POLICY</b>		Issue Status	5 <sup>th</sup> Edition, Rev 1
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**DYNAMIC POSITIONING OPERATIONS POLICY**

In compliance with IMO Guidelines and to develop procedures and best practice to an achievable international standard for all vessels operating in any class of DP, as defined by IMO Circular 645, within or outside a 500 metre zone, the company management recognizes the necessity and responsibility to provide :

- Industry Standard DP equipment,
- Industry Standard Operating requirements and guidelines,
- Industry Standard and Classification Society test and Documentation system.

for vessels fitted with Dynamic Positioning systems to mitigate the risk to personnel, the Vessel, other vessels or structures, sub-sea installations and the environment while performing operations under Dynamic Positioning control.

The Company endeavors to promote among its Dynamic Positioning Operators a high standard of Safety, Awareness and commitment to ensure that the key personnel involved in DP operations, DP system maintenance and repair are competent, well trained and have appropriate certification.



Signed: \_\_\_\_\_

**DANNY CHONG**  
 Head of POSH Fleet Services  
 15th Sept 2020

Date:

	<b>IMS 01 Appendix I SOCIAL MEDIA POLICY</b>		Issue Status	5 <sup>th</sup> Edition, Rev 1
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## Social Media Policy

While the company respect the right of employees to participate in social media networks, we require that when utilizing social networks (Facebook, Twitter, YouTube, LinkedIn, WhatsApp, WeChat, Viber and Facetime etc.) the following guidelines are adhered to:

**Participate Responsibly:** Your views and actions online can impact the company reputation. Refrain from posting items that could reflect negatively, or otherwise embarrass the company. Please exercise good judgement when using social media networks.

**Be Accurate:** If you are unsure of the accuracy of your comments, either refrain from publishing them or check with the Management who are always there to help, assist and guide.

**Respect Confidentiality:** Respect the privacy of your colleagues, company, clients and suppliers. Postings should not disclose information that is confidential or proprietary to the company, clients or vessel. Company's photos, logos and trademarks must only be used after obtaining written consent. If an incident has occurred on board a Company vessel, no information or pictures related to an incident shall be posted on any social media site as this may unnecessarily interfere with the investigation process.

**Be Accountable:** Please post online only what you would be comfortable saying to people in person or in public. Please remember that your words in public domain may be used against you or the company by anyone.

**Be Considerate:** Social media should not be used as a platform to harm, intimidate, insult, threaten, defame or embarrass others.

**Be responsible:** Please ensure that social media is used in a responsible manner such that it does not interfere with critical tasks such as navigation. Furthermore, rest must not be compromised as a result of social media activity.

In general, respecting differences, appreciating the diversity of opinions and speaking or conducting yourself in a professional manner is expected at all times.

**Personnel who fail to comply with this policy can expect disciplinary actions to be taken by the company, ranging from warnings to dismissal and legal consequences.**



Signed: \_\_\_\_\_

**DANNY CHONG**  
Head of POSH Fleet Services

Date: 15th Sept 2020

	<b>IMS 01 Appendix J</b> <b>CYBER SECURITY &amp; SHIP IT POLICY</b>		Issue Status	5 <sup>th</sup> Edition, Rev 1
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### Cyber Security & Ship IT Policy

The purpose of the Cyber Security & Ship IT Policy is to ensure vessels under the Management of Posh Fleet Services Pte Ltd complies with the following objectives;

- To ensure employee as well as contracted onboard personnel (herein referred to as users) are aware of the software permitted for use on the organization's computing resources. Installed software is strictly for business-use only.
- Define the rules of usage and behavior, the scope of hardware covered as well as the associated technical standards and specifications and are aware of risk, security and acceptable usage on their personal devices. These shall include any OT system that is provided by the Company.
- To ensure that PFS vessel can survive cyber-attacks and threats to its information system environment.
- To ensure information technology (IT) systems are used effectively, secure, integrated and also intended to minimize IT systems redundancies and, thus, minimize overall implementation and support cost. Improperly managed and supervised IT systems can lead to data loss and misuse, as well as fragmented information and disjointed processes.
- To minimize the possibility of an attack or threat to information security causing loss or damage to PFS or its clients.
- To minimize the extent of loss or damage from an information security breach or exposure.
- To inform all onboard personnel of their responsibilities and obligations with respect to information security.
- Established baseline against which improvement can be measured and correct contact person for different level incident and provide staff with common understanding of the incident management process and Standardize incident management and technical & service process
- Prevent the loss of incident, disruption from important task and unnecessary work if the incident is already known
- To manage security risks that are introduced by third parties, including contracted vendor service providers and members/participants.
- The intent is to ensure that the security of PFS information and information assets are not reduced when sharing information with third parties or by the introduction of third-party products or services into the PFS environment.



Signed: \_\_\_\_\_

**DANNY CHONG**  
 Head of POSH Fleet Services

Date: 15th Dec 2020