

SECURITY POLICY

The Managing Director and Senior Managers are committed to provide a secure working environment, by establishing and maintaining the required ship security protection measures to prevent unlawful acts against ships, which endanger the safety and security of persons and property onboard Company Ships.

The Managing Director and Senior Managers expect all their employees to comply with the security regulations of the ISPS Code, the procedures within the Ship Security Plan and Company-specific "Best Management Practices" (BMP4) at all times. All employees are expected to be familiar with their relevant security duties and the measures required to protect the Ship from any unlawful act and to deter Piracy in the Indian Ocean and in all other High Risk Areas, as identified by the Shipping Industry.

OBJECTIVE: The Company's principal objectives are to:

- Provide security procedures and practices for the transit and operation of the Ships in the HRA in order to protect the security of Ports and the wider community.
- Establish safeguards to reduce the risk to Crew, Port Personnel and Supernumeraries onboard Company Vessels.
- Support the transit and operation of the ships in HRA by employing Armed Guards
- Improve the security skills and awareness of Company Personnel ashore and onboard Ships.
- Prepare contingency measures for emergencies relating to possible security incidents.

These objectives will be achieved by:

- Issuing a Ship Security Assessment and a Ship Security Plan specific for each individual ship.
- Developing Company-specific BMP4 (Best Management Practices)
- Comprehensive training of all Company Personnel.
- Screening of PMSC (Private Maritime Security Contractors)
- Actively promoting security awareness amongst all Company Personnel.
- Conducting regular documented Reviews and Internal Audits of Security Procedures and Plans, in order to allow for constant update and improvement to the Ship Security Plan.

The Managing Director and Senior Managers are committed to provide the Company Security Officer, the Master and the Ship Security Officer, the necessary support to fulfill their duties and responsibilities in accordance with the ISPS Code, Chapter XI-2 of 1974 Solas Convention and relevant Shipping Industry sources.

The Master has the Ultimate Authority and responsibility to take decisions, which in his professional judgment, as Master, are necessary to maintain the Safety and Security of the Ship. If in the professional judgment of the Master, a conflict between any Safety and Security requirements applicable to the Ship arises during its operations, the Master shall give effect to those requirements necessary to maintain the safety of the Ship. In such cases, the Master shall implement temporary security measures and shall forthwith inform the Administration and, if appropriate, the Contracting Government in whose port the ship is operating or intends to enter. Any such temporary security measures under this Regulation shall, to the highest possible degree, be commensurate with the prevailing security level.

SIGNED _____
Managing Director