

# Sanctions Screening Operational Note



<b>Document Title</b>	Sanctions Screening Operational Note
<b>Document Ref</b>	SM/SEC/DOC/003
<b>ISO Standard</b>	Operational under SM/INT/POL/012 (ISO 18788:2015 / ISO 28000:2022 / ISO 28007:2015)
<b>Version</b>	1.0
<b>Classification</b>	Internal
<b>Effective Date</b>	11 May 2026
<b>Review Frequency</b>	As per Document Register defined review date, or upon significant change
<b>Owner</b>	Group Compliance Director
<b>Approved By</b>	Darren Watts, Group Compliance Director
<b>Applicable Entities</b>	Seagull Maritime FCZO, Seagull Maritime Malta, Seagull Maritime Nigeria, Seagull Maritime UK, Seagull Offshore

## PURPOSE

This operational note describes how sanctions screening is conducted in practice across Seagull Maritime, in support of SM/INT/POL/012 Sanctions Policy. It clarifies the workflow that supports the policy – first-line tool, triage forum, and escalation chain – and identifies who does what at each step.

## FIRST-LINE TOOL

Routine sanctions screening is conducted by the relevant function – Commercial, Operations, Compliance, or the Compliance Administrator – via self-service on OpenSanctions at <https://www.opensanctions.org/search/>. The search accepts free-text names, aliases, IMO numbers, and other identifiers, and returns matches across OFAC SDN, the UK Sanctions List, EU FSF, UN Consolidated, and OpenSanctions vessel designations.

There is no internal portal tool in use for routine screening. Where the self-service result is not clear, the matter is handed to the Compliance Administrator on the Compliance group chat (see below).

## TRIAGE FORUM

The Compliance group chat is the standing forum for sanctions screening conversations. Screening requests, results, and decisions are posted there for transparency. The Compliance Administrator monitors the chat and is the contact for any screening matter that needs a second pair of eyes.

## ESCALATION

Where a screening run returns no match, the screening is recorded by the function performing the check (name, date, source) and the engagement proceeds subject to any other due diligence obligations.

# Sanctions Screening Operational Note



Where a screening run returns an obvious match – a clearly designated vessel, party, entity, or jurisdiction – the engagement does not proceed. The decision to decline can be taken at department or Compliance Administrator level. Outcome posted on the Compliance group chat for transparency and recorded. Escalation to the Group Compliance Director is not required for clean-cut declines.

Where the screening result is contested, ambiguous, or where engagement would be commercially material despite a sanctions concern, the Compliance Administrator escalates the matter to the Group Compliance Director directly by email or message, with the screening result and context. The Group Compliance Director reviews, refers to external legal counsel where required, and either confirms the decline, issues a written determination, or escalates to the Chief Executive Officer.

Where engagement is to proceed despite an identified sanctions concern, a written determination from the Group Compliance Director or Chief Executive Officer is required before proceeding.

## RECORDS

Screening activity, hits, escalations, and determinations are retained in accordance with the Control of Records Procedure (SM/INT/PRO/005). External due diligence requests in which sanctions screening forms part of a wider response are captured on the Due Diligence Request Log (SM/SEC/REG/002).

## RELATED DOCUMENTS

SM/INT/POL/012 – Sanctions Policy

SM/INT/PRO/005 – Control of Records Procedure

SM/SEC/REG/002 – Due Diligence Request Log

## REVIEW

This operational note is reviewed annually or upon material change to the screening tools, the triage forum, or the escalation chain. The policy under which this note operates (SM/INT/POL/012) is the source of authority for any change in escalation thresholds or determination authority.

Darren Watts

**Group Compliance Director**

11/05/2026