



OCIMF PMSC GUIDANCE CHECKLIST

COMPLETED RESPONSES

Seagull Maritime Ltd

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Approved By	Pavel Shparber, Chief Executive Officer
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1. INTRODUCTION

This document contains the approved Seagull Maritime responses to the OCIMF PMSC Guidance Checklist (Appendix A), the standard due diligence questionnaire used across the maritime security industry for the pre-selection assessment of Private Maritime Security Companies (PMSCs).

The OCIMF PMSC Guidance Checklist is designed to be completed by the reviewing party (the client, ship owner/operator, or their appointed CSO/auditor) as part of a structured assessment of the PMSC. Industry practice has evolved such that PMSCs are routinely asked to provide pre-populated responses on behalf of the reviewer. These responses are provided by Seagull Maritime as the auditee to assist the review process. They do not replace the obligation of the reviewing party to independently verify the information provided.

All responses in this document are current as at the effective date stated in the document control table above. Supporting documents referenced in each response are available through the Seagull Maritime Due Diligence Document Portal (portals.seagullmaritimeltd.com/dd/) or upon request.

This document is version-controlled and reviewed quarterly by the Group Compliance Director. It shall be updated whenever a referenced document is revised, a new document is created that affects a DD response, or a change in certification, accreditation, or operational status requires an update to the stated position.

Document ref: SM/SEC/DOC/001 | Governed by: SM/SEC/PRO/002 (Due Diligence Response Procedure)

COMPANY INFORMATION

PMSC Name	Seagull Maritime Ltd	Registered Address	64 "Excalibur", B Bontadini Street, Birikirkara BKR1737, Malta	
PMSC Website	https://seagullmaritimeltd.com	Permanent Employees	~50	Established Since 2010

SECTION 1: GENERAL

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
General	1.1	The structure of the PMSC is clearly stated.	Yes	<p>Our company organisation chart (SM/INT/DOC/004) documents the internal organisation and lines of authority and management.</p> <p>Our company documentation sets out our company status, corporate structure and legal entity status. The company profile (SM/INT/DOC/004) document provides an overview of senior management, including CVs of the senior management team.</p> <p>Seagull Maritime is a private company and part of the Seagull Maritime Group. Our structure comprises a parent company, Seagull Maritime FZCO (Dubai, UAE), and our operating company for maritime security, Seagull Maritime Ltd, incorporated in Malta. Our head office is located in Athens, Greece, with additional offices in Dubai, Nigeria and the United Kingdom. Each office is associated with its own legal entity.</p> <p>CEO Pavel Shparber, Group Compliance Director Darren Watts, CCO Olga Zuck. Circa 250 personnel across 50 office/management staff and the operational PCASP pool.</p> <p>Supporting Documentation: DD Portal Section 1 — Company Structure: • Seagull Maritime Organisation Chart • SM POL — Seagull Maritime Company Profile 2026 • Company Structure Chart • Company Incorporation Documents • Platform Locations</p>
General	1.2	The PMSC has a clearly stated mission or vision statement which outlines high level and long-term aspirations of the company.	Yes	<p>Our mission and vision statements are outlined in our company profile (SM/INT/DOC/004), which is renewed annually and signed by the CEO. These align with our service portfolio: armed PCASP vessel protection, maritime security liaison, risk assessments, intelligence, training, and consultancy across Indian Ocean and West Africa regions.</p> <p>Seagull Maritime has been established since 2010, operational since 2011, with a 15+ year track record of continuous operations.</p> <p>Supporting Documentation: DD Portal Section 1 — Company Structure: • SM POL — Seagull Maritime Company Profile 2026</p>
General	1.3	The PMSC policies reflect their position with regard to safety, health, employment, alcohol, drugs, training, compliance, ethics, data protection, protection of persons and preservation of life.	Yes	<p>All documented policies are written in accordance with our integrated management system, ISO certification requirements and stakeholder expectations. Core policies include:</p> <ul style="list-style-type: none"> • OH&S Policy (SM/HSE/POL/001) — occupational health and safety under ISO 45001 • Security Management Policy — aligned with ISO 18788, ISO 28007 and ISO 28000 • Human Rights Policy (SM/SEC/POL/002) — VPSHR and ICoCA compliance • Rules on the Use of Force (SM/OPS/PRO/001) — proportionality, necessity and lawfulness • Drug and Alcohol Policy — zero tolerance, pre-employment and random testing • Data Protection and Document Control — SM/INT/PRO/002 • Training and Competency — company online learning platform for continuous development <p>Policy statements are signed by the CEO and reviewed at least annually during Management Review.</p>

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
General	1.4	The PMSC can demonstrate that procedures and instructions are aligned with the stated policies and these are reviewed on a periodic basis.	Yes	<p>Supporting Documentation: DD Portal Section 1 — General: • Policies folder (all current policies) • SM/HSE/POL/001 OH&S Policy • Rules on the Use of Force</p> <p>All documented procedures, SOPs and operational instructions are written in accordance with our management system, ISO certification and stakeholder requirements.</p> <p>Management review is conducted at a minimum of 12-monthly intervals. Individual departments meet regularly to review operations and activities.</p> <p>Document control is governed by SM/INT/PRO/002 (Document Control Procedure). Internal audits per SM/INT/PRO/003 (Internal Audit (SM/INT/PRO/003) Procedure) verify alignment. Non-conformance management is governed by SM/INT/PRO/001 (NCR/OFI/CAPA Management (SM/INT/PRO/001) Procedure).</p> <p>Company policies and procedures are provided accordingly throughout this questionnaire and further demonstration of alignment can be discussed and reviewed on-site.</p> <p>Supporting Documentation: DD Portal Section 1 — General: • Policies folder • SM/INT/PRO/001 NCR/OFI/CAPA Management • SM/INT/PRO/002 Document Control • SM/INT/PRO/003 Internal Audit • Management Review example</p>
General	1.5	The PMSC has a valid business registration certificate which corresponds with the address of their company office(s).	Yes	<p>Relevant documents provided.</p> <p>Supporting Documentation: DD Portal Section 1 — Company Structure: • Company Incorporation Documents • Seagull Maritime registration and ownership structure</p>
General	1.6	The PMSC has valid licence from their home country to trade as a security contractor.	Yes	<p>Malta (home country): S.L. 480.05 enacted 2013 but never operationalised — no licensing authority or application process currently exists. This has been confirmed with the Maltese authorities.</p> <p>Seagull Maritime ensures full legal compliance across all operating jurisdictions. The SM/INT/PRO/004 (External References and Standards Procedure (SM/INT/PRO/004)) monitors all flag state, coastal state and local licensing requirements on a task-by-task basis and monitors legislative developments to ensure continuous compliance.</p> <p>Supporting Documentation: DD Portal Section 1 — Company Structure: • Company Incorporation Documents • Registration and ownership structure</p>
General	1.7	The ownership of the PMSC has been verified. Owner(s) or shareholders are clearly stated and are not affiliated with any national governments.	Yes	<p>Relevant documents provided.</p> <p>Supporting Documentation: DD Portal Section 1 — Company Structure: • Shareholder and Ownership Confirmation • UBO Declaration • UBO Structure Explanation • Company Structure Chart</p>
General (cont.)	1.8	The PMSC has contracts with any national governments.	N/A	<p>Seagull Maritime has no contracts with any national governments. All client engagements are with commercial shipping companies, vessel operators and maritime industry clients.</p> <p>An appropriate government affiliation disclosure statement is provided.</p> <p>Supporting Documentation: DD Portal Section 1 — Company Structure: • Government Affiliation Disclosure</p>
General (cont.)	1.9	The security PMSC appears to be financially secure and annual accounts/bank references are available to support claims of financial stability.	Yes	<p>Able to provide subject to agreement and non-disclosure. These can be provided separately on discussion. As policy, we do not upload or provide financial documentation to external platforms.</p>

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
General (cont.)	1.10	The PMSC has provision for 24-hour emergency support to cover any potential occurrences.	Yes	<p>Company financially secure with 15+ years operational history (established 2010, operational since 2011).</p> <p>Supporting Documentation: Available on request subject to NDA</p> <p>24/7 Operations Centre established with duty director rotation for senior management emergency contact. Crisis response procedures (SM/INT/PRO/006) and incident management protocols define escalation pathways including:</p> <ul style="list-style-type: none"> • Immediate operational response via Operations Centre • Senior management escalation (CEO, Operations Director, GCD) • 24/7 access to maritime legal counsel • Client notification and coordination • Flag state and coastal state notification where required <p>Supporting Documentation: DD Portal Section 3 — Procedures: • SM SOP — Indian Ocean (SM/OPS/SOP/001), Annex F (Incident Management)</p>
General (cont.)	1.11	Members of the PMSC senior management have been involved in face-to-face discussions with ship owner/operator representative(s).	Yes	<p>We have a dedicated commercial team who interact daily with ship owners and operators, and travel regularly for in-person client meetings. Our CCO manages and monitors all client relationships.</p> <p>Our senior management, including CEO and Group Compliance Director, physically attend all client due diligence audits to engage with ship owners and clients on a face-to-face basis.</p>
General (cont.)	1.12	The PMSC has access to competent maritime legal advice (e.g. in-house counsel/ external legal advisors) on a 24/7 basis.	Yes	<p>We employ an in-house paralegal counsel for all daily and routine legal requirements and retain access to a specialist maritime lawyer for emergency and high-risk situations.</p> <p>Supporting Documentation: DD Portal Section 1 — General: • Legal Function and Governance Statement</p>
General (cont.)	1.13	<p>Does the PMSC have a documented policy that is used to implement the relevant guidance contained in the following generic Codes for the Security Industry:</p> <ul style="list-style-type: none"> • ICOC-PSSP (International Code of Conduct for Private Security Service Providers) <ul style="list-style-type: none"> • The Voluntary Principles • UN Basic Principles on the Use of Force & Firearms by Law Enforcement Officials (1990) 	Yes	<p>Our core policies are written and governed by the guidance and principles detailed. While we do not hold one specific policy to cover all of these (as the requirements vary across the business and may be applicable in different areas), we have multiple policies and procedures that document or demonstrate adherence to the recommended guidance.</p> <p>Key documents include the Rules on the Use of Force (SM/OPS/PRO/001), Human Rights Policy (SM/SEC/POL/002), Standard Operating Procedures and the ICoCA Code of Conduct (SM/INT/POL/002). Seagull Maritime is an ICoCA signatory and certified member.</p> <p>Supporting Documentation: DD Portal Section 1 — General: • Legal Confirmation Policy and Compliance • ICoCA Certified Member Certificate • Rules on the Use of Force • Human Rights Policy</p>

SECTION 2: EXPERIENCE AND KNOWLEDGE

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
Experience and knowledge	2.1	Is the PMSC established in the private security sector?	Yes	Seagull Maritime has been established in the private maritime security sector since 2010 (operational since 2011). Services include armed PCASP vessel protection, maritime security liaison officers, risk assessments, intelligence, vessel tracking, K9 stowaway operations, training, vessel security audits and consultancy. Seagull Maritime is a private commercial entity serving the maritime and offshore industry. Supporting Documentation: DD Portal Section 2 — Experience and Knowledge: • SM POL — Seagull Maritime Company Profile 2026
Experience and knowledge	2.2	If the PMSC has been established in the maritime private security sector for a period of less than 2 year as a “stand-alone” entity, proof of past experience has been reviewed.	N/A	Company established 2010, operational since 2011 — well exceeds the 2-year threshold. 15+ years of continuous operation in the maritime private security sector.
Experience and knowledge	2.3	The senior management of the PMSC have relevant experience and knowledge of the maritime security sector.	Yes	Senior management possess extensive maritime security expertise. 15-year operational history across Indian Ocean and West Africa threat environments. Senior leadership includes the CEO, Chief Commercial Officer, Group Compliance Director and West Africa Operations Director Supporting Documentation: DD Portal Section 1 — Company Structure: • Senior Management CVs • Company Profile 2026
Experience and knowledge	2.4	Appropriate written testimonials/references relating to previously undertaken maritime security assignments have been reviewed.	Yes	Written testimonials and references from previous clients are available for review. 15-year track record across Indian Ocean and West Africa demonstrates sustained client relationships. Supporting Documentation: DD Portal Section 2 — Experience and Knowledge: • Testimonials folder
Experience and knowledge	2.5	The PMSC is able to demonstrate a sound understanding of the current threats posed to merchant vessels in recognised high-risk areas and has established systems which allow them to maintain this under	Yes	The Master/CSO will be able to receive daily intelligence forecasts of the reporting area including boarding threat forecast, latest attack location information and analysis, Pirate Action Group (PAG) location updates, weather and surveillance effectiveness assessment, meteorological data, intelligence forecast, positional monitoring, and threat alerts specific to the vessel with dynamic diversion recommendations. Pre-deployment voyage-specific and port/geopolitical awareness assessments are prepared and briefed to the team Supporting Documentation: DD Portal Section 2 — Experience and Knowledge: • Intelligence forecast examples • Threat intelligence brief samples
Experience and knowledge	2.6	Does the PMSC demonstrate a sound understanding of the relevant sections of the following International Conventions: • UNCLOS (United Nations Convention on the Law of the Sea) • SUA (Suppression of Unlawful Acts against the Safety of Maritime Navigation) • SOLAS including ISPS Code	Yes	Documented understanding of UNCLOS, SUA Convention, SOLAS including ISPS Code. Understanding is embedded in operational SOPs and the External References and Standards Procedure (SM/INT/PRO/004). The Legal and Regulatory Requirements Register (SM/HSE/REG/002) and External Standards and References Register (SM/INT/REG/007) track all applicable conventions and standards. Maritime legal counsel is available 24/7 for interpretation of convention requirements. Supporting Documentation: DD Portal Section 2 — Experience and Knowledge: • Rules on the Use of Force (SM/OPS/PRO/001)

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
Experience and knowledge	2.7	The PMSC is able to demonstrate its knowledge and understanding of Industry standards/guidelines applicable to maritime security requirements for deployment of armed personnel on merchant vessels.	Yes	<p>Demonstrated knowledge of applicable maritime security standards including IMO Standards for Private Maritime Security, BMP-MS (Best Management Practices — Maritime Security), ISO 28007:2015, ISO 18788:2015, ISO 28000:2022, ICOC-PSSP, VPSHR, UN Basic Principles on the Use of Force and Firearms. ICoCA signatory and certified member.</p> <p>Procedures document SOLAS/ISPS Code provisions and vessel Ship Security Plan integration requirements.</p> <p>Supporting Documentation: DD Portal Section 6 — Accreditation: • ISO 28007 Certificate • ICoCA Certified Member Certificate</p>

SECTION 3: PMSC PROCEDURES

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
PMSC procedures	3.1	Documented procedures relating to vessel protection and reporting embrace the provisions outlined in the most recent version of Best Management Practices.	Yes	<p>Seagull Maritime operational procedures are written in full compliance with BMP-MS (Best Management Practices — Maritime Security, 2025). The SM SOP — Indian Ocean (SM/OPS/SOP/001) and its Annexes A–H provide comprehensive vessel protection and reporting procedures covering deployment, vessel familiarisation, vessel hardening, onboard routines, vessel defence, incident management, weapons and equipment management, and disembarkation.</p> <p>Note: Seagull Maritime is transitioning its operational documentation to a new integrated management system framework. The Indian Ocean Region SOP (SM SOP — Indian Ocean, ref: SMS/SOP/IO/001) and its Annexes A–H replace the legacy Embarked Teams Manual (M-3001) and Embarked Team Procedures (SOP-3001) for IOR operations. Personnel who have completed training on the updated procedures via the company online learning platform operate under the current SOPs. Personnel deployed prior to training completion continue to operate under legacy procedures for an interim period, in compliance with ISO 28007:2015 requirements that all personnel shall be trained on current procedures before implementation. Both current and legacy SOPs are provided in the due diligence document pack for full transparency.</p> <p>Supporting Documentation: DD Portal Section 3 — Procedures: • SM SOP — Indian Ocean (current) • M-3001 Embarked Teams Manual (legacy, provided for transparency)</p>
PMSC procedures	3.2	Documented procedures include guidance on chain of authority and change of PMSC command whenever a security team are embarked onboard a merchant vessel?	Yes	<p>The SM SOP — Indian Ocean (SM/OPS/SOP/001), Annex B (Vessel Familiarisation) documents the command-and-control structure. The Master always retains absolute authority over the vessel. The security team operates under the Master's direction within agreed rules of engagement. The Team Leader serves as the interface between the security team and the Master.</p> <p>BIMCO GUARDCON contracts establish the contractual chain of authority. Command succession is defined in the event the Team Leader becomes incapacitated.</p> <p>Note: Seagull Maritime is transitioning its operational documentation to a new integrated management system framework. The Indian Ocean Region SOP (SM SOP — Indian Ocean, ref: SMS/SOP/IO/001) and its Annexes A–H replace the legacy Embarked Teams Manual (M-3001) and Embarked Team Procedures (SOP-3001) for IOR operations. Personnel who have completed training on the updated procedures via the company online learning platform operate under the current SOPs. Personnel deployed prior to training completion continue to operate under legacy procedures for an interim period, in compliance with ISO 28007:2015 requirements that all personnel shall be trained on current procedures before implementation. Both current and legacy SOPs are provided in the due diligence document pack for full transparency.</p> <p>Supporting Documentation: DD Portal Section 3 — Procedures: • SM SOP — Indian Ocean, Annex B • M-3001 Embarked Teams Manual (legacy) • BIMCO GUARDCON (sample)</p>
PMSC procedures	3.3	Documented procedure for the notification of Flag State when armed security team is deployed onboard a merchant vessel.	Yes	<p>The External References and Standards Procedure (SM/INT/PRO/004) requires task-by-task flag state approvals. The Flag State Requirements Register (SM/SEC/REG/001) tracks 37 flag states with</p>

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
		(See section 7 for further checks regarding Flag State approval processes)		<p>specific notification requirements, approval types (annual vs task-by-task), documentation requirements and timelines.</p> <p>Annual approvals held for Panama and Liberia. Task-by-task approvals obtained for Marshall Islands, Singapore, Hong Kong, Bahamas and others. 1Clearview ERP tracks flag notification status per deployment.</p> <p>Supporting Documentation: DD Portal Section 7 — Flag State Approval: • SM/INT/PRO/004 External References and Standards Procedure • Flag approval folder</p>
PMSC procedures	3.4	<p>Documented procedures provide clear guidance on the decision-making process to be followed (rules of for the use of force) prior to taking any decision to use force. These should contain:</p> <ul style="list-style-type: none"> • Threat analysis • Stage-wise response: • Non-lethal options • Use of force options other than lethal force • Use of lethal force 	Yes	<p>The Rules on the Use of Force (SM/OPS/PRO/001) document provides the decision-making framework covering:</p> <ul style="list-style-type: none"> • Threat analysis protocols — detection, identification and assessment of potential threats • Stage-wise response — non-lethal options (verbal warnings, visual signals, flares, course alterations, LRAD) • Use of force options short of lethal (warning shots) • Use of lethal force — self-defence against armed attackers as last resort only, when all other measures have been exhausted and there is an immediate threat to life <p>The RUF reflects the proportionality principle, UN Basic Principles and VPSHR requirements. Operational implementation is documented in SM SOP — Indian Ocean (SM/OPS/SOP/001), Annex E (Vessel Defence).</p> <p>Note: Seagull Maritime is transitioning its operational documentation to a new integrated management system framework. The Indian Ocean Region SOP (SM SOP — Indian Ocean, ref: SMS/SOP/IO/001) and its Annexes A–H replace the legacy Embarked Teams Manual (M-3001) and Embarked Team Procedures (SOP-3001) for IOR operations. Personnel who have completed training on the updated procedures via the company online learning platform operate under the current SOPs. Personnel deployed prior to training completion continue to operate under legacy procedures for an interim period, in compliance with ISO 28007:2015 requirements that all personnel shall be trained on current procedures before implementation. Both current and legacy SOPs are provided in the due diligence document pack for full transparency.</p> <p>Supporting Documentation: DD Portal Section 3 — Procedures: • Rules on the Use of Force • SM SOP — Indian Ocean, Annex E (Vessel Defence) • SOP-3004 RUF (legacy)</p>
PMSC procedures	3.5	Documented procedures for the “use of force” include documented procedures giving guidance on specific orders when firearms can be loaded and “made ready” for use.	Yes	<p>SM SOP — Indian Ocean (SM/OPS/SOP/001), Annex G (Weapons and Equipment Management) specifies Normal Safety Procedures and weapon-specific handling, clearing and readiness procedures. Firearms readiness status is governed by weapons states linked to the threat escalation framework.</p> <p>Annex E (Vessel Defence) defines the decision points at which weapons deployment is authorised.</p> <p>Note: Seagull Maritime is transitioning its operational documentation to a new integrated management system framework. The Indian Ocean Region SOP (SM SOP — Indian Ocean, ref: SMS/SOP/IO/001) and its Annexes A–H replace the legacy Embarked Teams Manual (M-3001) and Embarked Team Procedures (SOP-3001) for IOR operations. Personnel who have completed training on the updated procedures via the company online learning platform operate under the</p>

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
PMSC procedures	3.6	The PMSC can provide details of rationale for selected firearms deployed.	Yes	<p>current SOPs. Personnel deployed prior to training completion continue to operate under legacy procedures for an interim period, in compliance with ISO 28007:2015 requirements that all personnel shall be trained on current procedures before implementation. Both current and legacy SOPs are provided in the due diligence document pack for full transparency.</p> <p>Supporting Documentation: DD Portal Section 3 — Procedures: • SM SOP — Indian Ocean, Annex G and Annex E • M-3001 Embarked Teams Manual (legacy) • Rules on the Use of Force (SM/OPS/PRO/001)</p> <p>Semi-automatic rifles (5.56mm/7.62mm) selected based on the maritime threat environment. Rationale considers proportional response capability, platform reliability in the maritime environment, ammunition commonality, and flag state approval requirements. Weapon type is approved task-by-task by flag states.</p> <p>The Security and Business Risk Assessment Procedure (SM/SEC/PRO/001) informs weapon selection through threat and risk analysis. We have a documented weapons selection and procurement procedure.</p> <p>Supporting Documentation: DD Portal Section 3 — Procedures: • SM/SEC/PRO/001 Security and Business Risk Assessment Procedure • SM SOP — Indian Ocean (SM/OPS/SOP/001), Annex G</p>
PMSC procedures	3.7	PMSC documented procedures provide clear requirements relating to the procurement, ownership, and registration of firearms. Evidence of such documentation should be available for review.	Yes	<p>All weapons are legally purchased, registered and licensed for anti-piracy activities under Seagull Maritime Ltd. Weapons are strictly chosen to comply with all necessary registration and regulation required by applicable national and international law.</p> <p>All weaponry and ammunition registration is tracked in 1Clearview ERP with full chain of custody. SM SOP — Indian Ocean (SM/OPS/SOP/001), Annex G (Weapons and Equipment Management) covers licensing, control and compliance requirements.</p> <p>Note: Seagull Maritime is transitioning its operational documentation to a new integrated management system framework. The Indian Ocean Region SOP (SM SOP — Indian Ocean, ref: SMS/SOP/IO/001) and its Annexes A–H replace the legacy Embarked Teams Manual (M-3001) and Embarked Team Procedures (SOP-3001) for IOR operations. Personnel who have completed training on the updated procedures via the company online learning platform operate under the current SOPs. Personnel deployed prior to training completion continue to operate under legacy procedures for an interim period, in compliance with ISO 28007:2015 requirements that all personnel shall be trained on current procedures before implementation. Both current and legacy SOPs are provided in the due diligence document pack for full transparency.</p> <p>Supporting Documentation: DD Portal Section 3 — Procedures: • SM SOP — Indian Ocean, Annex G • Weapons registration documents</p>
PMSC procedures	3.8	PMSC documented procedures provide clear requirements relating to the management of firearms including upkeep of weapons, transportation to and from a vessel, storage in approved containers and storage.	Yes	<p>SM SOP — Indian Ocean (SM/OPS/SOP/001), Annex G documents comprehensive firearms management including:</p> <ul style="list-style-type: none"> • Upkeep — cleaning, maintenance and function testing • Transportation — secure transport in approved containers with chain of custody documentation • Onboard storage — approved containers, secured storage areas, inventory tracking via 1Clearview ERP

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
				<ul style="list-style-type: none"> Maritime-specific corrosion mitigation and ammunition management Additional procedures for LNG/LPG/tanker operations address intrinsically safe requirements. Note: Seagull Maritime is transitioning its operational documentation to a new integrated management system framework. The Indian Ocean Region SOP (SM SOP — Indian Ocean, ref: SMS/SOP/IO/001) and its Annexes A–H replace the legacy Embarked Teams Manual (M-3001) and Embarked Team Procedures (SOP-3001) for IOR operations. Personnel who have completed training on the updated procedures via the company online learning platform operate under the current SOPs. Personnel deployed prior to training completion continue to operate under legacy procedures for an interim period, in compliance with ISO 28007:2015 requirements that all personnel shall be trained on current procedures before implementation. Both current and legacy SOPs are provided in the due diligence document pack for full transparency. Supporting Documentation: DD Portal Section 3 — Procedures: • SM SOP — Indian Ocean, Annex G • SOP-3002 LNG, LPG, Tankers Additional Procedure • SOP-3003 Weapons and Security Equipment (legacy)
PMSC procedures	3.9	Responsibilities for lifesaving duties during vessel protection assignments have been clearly identified.	Yes	The minimum team composition includes a designated qualified medic (STCW A-VI/1-4 Advanced First Aid or equivalent). SM SOP — Indian Ocean (SM/OPS/SOP/001), Annex D (Onboard Routines) defines the medic's responsibilities including first aid provision, trauma kit management and medical equipment familiarisation. All team members hold STCW certification ensuring basic medical competency. Lifesaving duties are briefed during vessel familiarisation (Annex B) and rehearsed during onboard drills. Note: Seagull Maritime is transitioning its operational documentation to a new integrated management system framework. The Indian Ocean Region SOP (SM SOP — Indian Ocean, ref: SMS/SOP/IO/001) and its Annexes A–H replace the legacy Embarked Teams Manual (M-3001) and Embarked Team Procedures (SOP-3001) for IOR operations. Personnel who have completed training on the updated procedures via the company online learning platform operate under the current SOPs. Personnel deployed prior to training completion continue to operate under legacy procedures for an interim period, in compliance with ISO 28007:2015 requirements that all personnel shall be trained on current procedures before implementation. Both current and legacy SOPs are provided in the due diligence document pack for full transparency. Supporting Documentation: DD Portal Section 3 — Procedures: • SM SOP — Indian Ocean, Annex B and Annex D • SOP-3001 Embarked Team Procedures (legacy)
PMSC procedures	3.10	PMSC documented procedures give due account toward preserving a non-hazardous environment onboard vessel type which seek to maintain intrinsically safe operations.	Yes	SOP-3002 LNG, LPG, Tankers Additional Procedure provides specific guidance for operations on vessels carrying hazardous cargo. This covers fire and explosion prevention, ignition source elimination on cargo decks, electrical equipment restrictions (intrinsically safe radios only), synthetic clothing hazards, and mobile phone restrictions. H&S Risk Assessments (SM/HSE/RA series) cover vessel-type-specific hazards. Supporting Documentation: DD Portal Section 3 — Procedures: • SOP-3002 LNG, LPG, Tankers Additional Procedure • SM/HSE/RA series — H&S Risk Assessments
PMSC procedures	3.11	PMSC documented procedures provide details of the incident record keeping and reporting protocols to be followed for each	Yes	SM SOP — Indian Ocean (SM/OPS/SOP/001), Annex F (Incident Management) documents comprehensive incident record-keeping and reporting protocols. Coverage includes:

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
		instance when the PMSC or the vessel's Master considered the vessel security to have been threatened.		<ul style="list-style-type: none"> • Immediate Operations Centre notification • Master notification • Flag/coastal state notification • Incident documentation (timeline, witness statements, photographic/video evidence, weapon discharge records) • Use of Force Reporting Form — triggered by any weapon use, escalation of force, or injury • Post-incident investigation and scene management • Communication via VHF Ch16, satellite, DSC, GMDSS, SSAS, AIS and email <p>Note: Seagull Maritime is transitioning its operational documentation to a new integrated management system framework. The Indian Ocean Region SOP (SM SOP — Indian Ocean, ref: SMS/SOP/IO/001) and its Annexes A–H replace the legacy Embarked Teams Manual (M-3001) and Embarked Team Procedures (SOP-3001) for IOR operations. Personnel who have completed training on the updated procedures via the company online learning platform operate under the current SOPs. Personnel deployed prior to training completion continue to operate under legacy procedures for an interim period, in compliance with ISO 28007:2015 requirements that all personnel shall be trained on current procedures before implementation. Both current and legacy SOPs are provided in the due diligence document pack for full transparency.</p> <p>Supporting Documentation: DD Portal Section 3 — Procedures: • SM SOP — Indian Ocean, Annex F • Incident Management Plan</p>
Procedures (cont.)	3.12	The PMSC has clearly stated incident investigation procedures and records which support detailed route analysis and a process for capturing lessons learnt. Incident investigation examples should contain clear account of incident, witness statements, actions taken, identification of any non-compliance with procedures and supporting evidence if available.	Yes	<p>SM SOP — Indian Ocean (SM/OPS/SOP/001), Annex F (Incident Management) covers scene assessment, investigation methodology and forensic evidence protection. SM/INT/PRO/001 (NCR/OFI/CAPA Management (SM/INT/PRO/001) Procedure) provides the framework for capturing non-conformances, corrective actions and lessons learned.</p> <p>Post-incident reports include clear account of incident, witness statements, actions taken, identification of any non-compliance with procedures and supporting evidence. Findings feed back into risk intelligence updates and procedure reviews.</p> <p>Note: Seagull Maritime is transitioning its operational documentation to a new integrated management system framework. The Indian Ocean Region SOP (SM SOP — Indian Ocean, ref: SMS/SOP/IO/001) and its Annexes A–H replace the legacy Embarked Teams Manual (M-3001) and Embarked Team Procedures (SOP-3001) for IOR operations. Personnel who have completed training on the updated procedures via the company online learning platform operate under the current SOPs. Personnel deployed prior to training completion continue to operate under legacy procedures for an interim period, in compliance with ISO 28007:2015 requirements that all personnel shall be trained on current procedures before implementation. Both current and legacy SOPs are provided in the due diligence document pack for full transparency.</p> <p>Supporting Documentation: DD Portal Section 3 — Procedures: • SM SOP — Indian Ocean, Annex F • SM/INT/PRO/001 NCR/OFI/CAPA Management •</p>
Procedures (cont.)	3.13	The PMSC has documented procedures/ protocols for safe custody of any arrested/ detained individuals.	Yes	<p>Documented procedures address the treatment of detained persons. Key principles:</p>

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
				<ul style="list-style-type: none"> • At all times it is the Master's decision whether to detain someone • Detained persons shall be always treated humanely and with dignity • Searches only to determine no weapons are present, supervised, personal effects recorded and secured • Adequate food, water, lighting, heating, ventilation and sanitation provided • Religious practice accommodated where not a security risk • Medical treatment provided to sick or injured, CASEVAC arranged if needed • No discipline or punishment shall be inflicted • Detainees in custody of the flag state of the ship <p>Maritime legal counsel available 24/7 for guidance on detention matters.</p> <p>IMPORTANT NOTE – PCASP are not on board to provide these services in the first instance and all procedures for this should be discussed in alignment with the client</p> <p>Supporting Documentation: DD Portal Section 3 — Procedures: • SM SOP — Indian Ocean (SM/OPS/SOP/001) (detained persons provisions) • Rules on the Use of Force (SM/OPS/PRO/001)</p>
Procedures (cont.)	3.14	The PMSC has a clearly stated emergency response/communications plan including 24-hour support and clearly stated responsibilities of shore response team members. Plan accounts for emergency situations such as medical incidents, missing persons, hijacking/kidnapping, emergency repatriation.	Yes	<p>Crisis response procedures (SM/INT/PRO/006) define the emergency response and communications plan including:</p> <ul style="list-style-type: none"> • 24/7 Incident and Crisis Management (SM/INT/PRO/006) Team availability • Incident vs crisis definitions and escalation pathway • Communication methods: VHF Ch16, satellite phone, DSC, GMDSS, SSAS, AIS, email • Shore response team responsibilities • Coverage for: medical incidents, missing persons, hijacking/kidnapping, emergency repatriation, pirate attack, casualty management <p>SM SOP — Indian Ocean (SM/OPS/SOP/001), Annex F (Incident Management) provides the operational implementation.</p> <p>Note: Seagull Maritime is transitioning its operational documentation to a new integrated management system framework. The Indian Ocean Region SOP (SM SOP — Indian Ocean, ref: SMS/SOP/IO/001) and its Annexes A–H replace the legacy Embarked Teams Manual (M-3001) and Embarked Team Procedures (SOP-3001) for IOR operations. Personnel who have completed training on the updated procedures via the company online learning platform operate under the current SOPs. Personnel deployed prior to training completion continue to operate under legacy procedures for an interim period, in compliance with ISO 28007:2015 requirements that all personnel shall be trained on current procedures before implementation. Both current and legacy SOPs are provided in the due diligence document pack for full transparency.</p> <p>Supporting Documentation: DD Portal Section 3 — Procedures: • Incident Management Plan • SM SOP — Indian Ocean, Annex F</p>

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
Procedures (cont.)	3.15	The PMSC has documented presentations for Ship's Master and crew on anti-piracy measures associated with the deployment of PMSC personnel to merchant vessel and expected roles and responsibilities of	Yes	<p>SM SOP — Indian Ocean (SM/OPS/SOP/001), Annex A (Deployment and Embarkation) and Annex B (Vessel Familiarisation) require a formal coordination briefing with the Master and crew upon embarkation. Content includes:</p> <ul style="list-style-type: none"> • Current threat profile and intelligence • Vessel hardening plan and Ship Security Plan compliance • Roles and responsibilities of crew during security incidents • Muster stations, restricted areas and emergency procedures • Communication protocols between security team and bridge • Reporting procedures <p>A dedicated Master's Briefing document is also provided as part of the operational intelligence pack.</p> <p>Note: Seagull Maritime is transitioning its operational documentation to a new integrated management system framework. The Indian Ocean Region SOP (SM SOP — Indian Ocean, ref: SMS/SOP/IO/001) and its Annexes A–H replace the legacy Embarked Teams Manual (M-3001) and Embarked Team Procedures (SOP-3001) for IOR operations. Personnel who have completed training on the updated procedures via the company online learning platform operate under the current SOPs. Personnel deployed prior to training completion continue to operate under legacy procedures for an interim period, in compliance with ISO 28007:2015 requirements that all personnel shall be trained on current procedures before implementation. Both current and legacy SOPs are provided in the due diligence document pack for full transparency.</p> <p>Supporting Documentation: DD Portal Section 3 — Procedures: • SM SOP — Indian Ocean, Annexes A and B • Master's Briefing document • SOP-3001 Embarked Team Procedures (legacy)</p>
Procedures (cont.)	3.16	The PMSC follows a documented process which provides the shipping company with a detailed post-deployment report. The report should contain full details of the deployment, operational matters, any training and/or ship hardening provided by the PMSC team and any advice as to any further security enhancements which may be considered.	Yes	<p>SM SOP — Indian Ocean (SM/OPS/SOP/001), Annex H (Disembarkation and Post Transit) requires submission of a Post Transit Report within 48 hours of disembarkation. The report documents:</p> <ul style="list-style-type: none"> • Full details of the deployment and operational matters • Any training provided and ship hardening recommendations • Threat events and any use of force incidents • Team member assessment forms • Incident reports, weapon discharge reports • Recommendations for further security enhancements <p>Note: Seagull Maritime is transitioning its operational documentation to a new integrated management system framework. The Indian Ocean Region SOP (SM SOP — Indian Ocean, ref: SMS/SOP/IO/001) and its Annexes A–H replace the legacy Embarked Teams Manual (M-3001) and Embarked Team Procedures (SOP-3001) for IOR operations. Personnel who have completed training on the updated procedures via the company online learning platform operate under the current SOPs. Personnel deployed prior to training completion continue to operate under legacy procedures for an interim period, in compliance with ISO 28007:2015 requirements that all</p>

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
				<p>personnel shall be trained on current procedures before implementation. Both current and legacy SOPs are provided in the due diligence document pack for full transparency.</p> <p>Supporting Documentation: DD Portal Section 3 — Procedures: • SM SOP — Indian Ocean, Annex H • Post Transit Report template • SOP-3001 Embarked Team Procedures (legacy)</p>

SECTION 4: EMPLOYEE SCREENING

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
Employee screening	4.1	The PMSC's employee selection and employment process is clearly documented with relevant minimum standards/ expectations detailed.	Yes	PCASP Recruitment and Screening procedure (SM/INT/PRO/008) defines the recruitment pipeline including minimum standards, entry requirements, pre-employment checks, induction requirements and ongoing performance management. 1Clearview ERP tracks personnel records, certifications and training status throughout the employment lifecycle. Supporting Documentation: DD Portal Section 4 — Employee Screening: • PCASP Recruitment and Screening Procedure (SM/INT/PRO/008) • Training and Competency Procedure
Employee screening	4.2	The PMSC employee selection process includes minimum expectations which are required prior to any person being designated as a team leader. Such team leader expectations may include demonstration of d	Yes	Team Leader selection standards include advanced weapons proficiency, demonstrated leadership and decision-making under threat, crisis response capability, familiarity with maritime law and conventions, communication skills for the Master interface, incident documentation competency, and previous maritime security deployment experience. Team composition models and TL duties are defined in SM SOP — Indian Ocean (SM/OPS/SOP/001), Annex D (Onboard Routines). Note: Seagull Maritime is transitioning its operational documentation to a new integrated management system framework. The Indian Ocean Region SOP (SM SOP — Indian Ocean, ref: SMS/SOP/IO/001) and its Annexes A–H replace the legacy Embarked Teams Manual (M-3001) and Embarked Team Procedures (SOP-3001) for IOR operations. Personnel who have completed training on the updated procedures via the company online learning platform operate under the current SOPs. Personnel deployed prior to training completion continue to operate under legacy procedures for an interim period, in compliance with ISO 28007:2015 requirements that all personnel shall be trained on current procedures before implementation. Both current and legacy SOPs are provided in the due diligence document pack for full transparency. Supporting Documentation: DD Portal Section 4 — Employee Screening: • PCASP Recruitment and Screening Procedure (SM/INT/PRO/008) • SM SOP — Indian Ocean, Annex D
Employee screening	4.3	Appropriate identity and criminal record background checks to security company's home country legal obligations.	Yes	Pre-employment checks are mandatory per the PCASP Recruitment and Screening procedure (SM/INT/PRO/008): identity verification (passport, government-issued ID), criminal record background checks conducted directly or through approved third-party providers. All check results documented and retained in 1Clearview ERP. Supporting Documentation: DD Portal Section 4 — Employee Screening: • PCASP Recruitment and Screening Procedure (SM/INT/PRO/008)
Employee screening	4.4	Verification of previous employment references and employment history, including review of documented references and testimonials.	Yes	Previous employer references and employment history verification are mandatory. Employment gaps are investigated. Reference check documentation recorded and retained in 1Clearview ERP. Supporting Documentation: DD Portal Section 4 — Employee Screening: • PCASP Recruitment and Screening Procedure (SM/INT/PRO/008)

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
Employee screening	4.5	Verification of experience and certification regarding the use and carriage of firearm types which would be deployed onboard merchant vessels.	Yes	<p>Candidates are required to complete a weapons knowledge and handling assessment for the weapon systems to be deployed. This knowledge is verified during the weapons handling test. All deployed personnel must complete and pass the same training course regardless of military background or previous maritime experience.</p> <p>Firearms Competency (SM/INT/PRO/009) Certification is re-validated every 12 months as per SM SOP — Indian Ocean (SM/OPS/SOP/001), Annex G.</p> <p>Note: Seagull Maritime is transitioning its operational documentation to a new integrated management system framework. The Indian Ocean Region SOP (SM SOP — Indian Ocean, ref: SMS/SOP/IO/001) and its Annexes A–H replace the legacy Embarked Teams Manual (M-3001) and Embarked Team Procedures (SOP-3001) for IOR operations. Personnel who have completed training on the updated procedures via the company online learning platform operate under the current SOPs. Personnel deployed prior to training completion continue to operate under legacy procedures for an interim period, in compliance with ISO 28007:2015 requirements that all personnel shall be trained on current procedures before implementation. Both current and legacy SOPs are provided in the due diligence document pack for full transparency.</p> <p>Supporting Documentation: DD Portal Section 4 — Employee Screening: • Training and Competency Procedure • Operator personal document examples</p>
Employee screening (cont.)	4.6	Military and law enforcement background checks. To include assignments and qualifications attained during service.	Yes	<p>Pre-employment checks include military and law enforcement background verification: service record, discharge status, disciplinary record review and qualification verification. Background checks verify all service claims via official records.</p> <p>Supporting Documentation: DD Portal Section 4 — Employee Screening: • PCASP Recruitment and Screening Procedure (SM/INT/PRO/008)</p>
Employee screening (cont.)	4.7	Physical fitness testing (including tests for drug and alcohol use/misuse) – Standards such as Seafarers ENG1 Medical for UK nationals confirm employees are fit for purpose.	Yes	<p>Pre-employment checks include physical fitness and medical examination with drug and alcohol screening. ENG1 Medical certification (UK nationals) or equivalent seafarer fitness certification required. Annual medical recertification for continued deployment eligibility. Zero tolerance drug and alcohol policy enforced.</p> <p>Supporting Documentation: DD Portal Section 4 — Employee Screening: • PCASP Recruitment and Screening Procedure (SM/INT/PRO/008) • Drug and Alcohol Policy</p>
Employee screening (cont.)	4.8	The PMSC employee screening process includes confirmation that proposed candidates are assessed to be of sound mental health.	Yes	<p>Pre-employment screening includes assessment of mental health suitability for high-stress maritime security operations: decision-making under threat, emotional stability, judgment and impulse control.</p> <p>Supporting Documentation: DD Portal Section 4 — Employee Screening: • PCASP Recruitment and Screening Procedure (SM/INT/PRO/008)</p>
Employee screening (cont.)	4.9	The PMSC employee screening process includes aspects of aptitude and psychological testing.	Yes	<p>Aptitude and suitability assessment forms part of the pre-employment screening process, including evaluation of cognitive ability, stress response and suitability for armed maritime security operations.</p> <p>Supporting Documentation: DD Portal Section 4 — Employee Screening: • PCASP Recruitment and Screening Procedure (SM/INT/PRO/008)</p>

SECTION 5: TRAINING

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
Training	5.1	Minimum marine security contractor training expectations (e.g. STCW, MFCC, First Aid) are clearly stated within the PMSC procedures.	Yes	<p>Training and Competency procedures document minimum requirements including:</p> <ul style="list-style-type: none"> • STCW Modules (A-VI/1-1 through A-VI/1-4) • Maritime Firearms Competency (SM/INT/PRO/009) Certification (MFCC) — 12-monthly re-validation • Advanced First Aid / Trauma Medical Care • Ship Security Officer certification • Anti-Piracy Awareness Course (APAC) <p>All training records maintained in 1Clearview ERP. Company online learning platform provides continuous professional development including procedure-specific modules with assessment and certification.</p> <p>Supporting Documentation: DD Portal Section 5 — Training: • Training and Competency Procedure • Syllabus folder • Operator personal document examples</p>
Training	5.2	Basic ship-board familiarisation training prior to embarking any merchant vessel.	Yes	<p>SM SOP — Indian Ocean (SM/OPS/SOP/001), Annex B (Vessel Familiarisation) requires a minimum 4-hour ship safety orientation upon embarkation including: emergency exits and evacuation routes, muster stations and lifeboats, accommodation placement, equipment stowage, vessel security survey, fire safety systems, and coordination meeting with the Master.</p> <p>Note: Seagull Maritime is transitioning its operational documentation to a new integrated management system framework. The Indian Ocean Region SOP (SM SOP — Indian Ocean, ref: SMS/SOP/IO/001) and its Annexes A–H replace the legacy Embarked Teams Manual (M-3001) and Embarked Team Procedures (SOP-3001) for IOR operations. Personnel who have completed training on the updated procedures via the company online learning platform operate under the current SOPs. Personnel deployed prior to training completion continue to operate under legacy procedures for an interim period, in compliance with ISO 28007:2015 requirements that all personnel shall be trained on current procedures before implementation. Both current and legacy SOPs are provided in the due diligence document pack for full transparency.</p> <p>Supporting Documentation: DD Portal Section 5 — Training: • SM SOP — Indian Ocean, Annex B • M-3001 Embarked Teams Manual (legacy) • Syllabus folder</p>
Training	5.3	Any additional requirements of relevant Flag State(s) (Basic Sea survival, Ship Security Officer, Tanker Familiarisation, Marine Firefighting, etc.)	Yes	<p>The Flag State Requirements Register (SM/SEC/REG/001) tracks training requirements for 37 flag states. The External References and Standards Procedure (SM/INT/PRO/004) monitors flag-specific training obligations on a task-by-task basis.</p> <p>Certificate examples are available for review.</p> <p>Supporting Documentation: DD Portal Section 5 — Training: • Training and Competency Procedure • Operator personal document examples</p>

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
Training	5.4	Training in the PMSC’s specific procedures with focus on the carriage and management of firearms, onboard chain of authority and the different stages of the documented decision-making processes.	Yes	<p>All personnel complete training on company-specific procedures including:</p> <ul style="list-style-type: none"> • Weapons handling, safety and management (SM SOP — Indian Ocean (SM/OPS/SOP/001), Annex G) • Chain of authority and command structure (Annex B) • Rules on the Use of Force (SM/OPS/PRO/001) and graduated escalation framework • Vessel defence decision-making processes (Annex E) <p>Training is delivered through the company online learning platform with assessment and certification. Procedure-specific training must be completed before personnel are deployed under current SOPs.</p> <p>Note: Seagull Maritime is transitioning its operational documentation to a new integrated management system framework. The Indian Ocean Region SOP (SM SOP — Indian Ocean, ref: SMS/SOP/IO/001) and its Annexes A–H replace the legacy Embarked Teams Manual (M-3001) and Embarked Team Procedures (SOP-3001) for IOR operations. Personnel who have completed training on the updated procedures via the company online learning platform operate under the current SOPs. Personnel deployed prior to training completion continue to operate under legacy procedures for an interim period, in compliance with ISO 28007:2015 requirements that all personnel shall be trained on current procedures before implementation. Both current and legacy SOPs are provided in the due diligence document pack for full transparency.</p> <p>Supporting Documentation: DD Portal Section 5 — Training: • SM SOP — Indian Ocean, Annexes B, E and G • Rules on the Use of Force • Training and Competency Procedure</p>
Training	5.5	<p>Training in the use and care of the specific make and model of security equipment (Including firearms) which personnel may be expected to use/deploy.</p> <p>Should include:</p> <ul style="list-style-type: none"> • Date of last qualification, • Weapon(s) used in qualification • Number of rounds fired (against qualification standards – Military spec preferred) 	Yes	<p>All PMSC personnel complete marksmanship assessment with deployed weapon types (5.56mm/7.62mm semi-automatic rifles). Firearms Competency (SM/INT/PRO/009) Certification is re-validated every 12 months. Records maintained in 1Clearview ERP with date, weapon type, score and assessor identification.</p> <p>SM SOP — Indian Ocean (SM/OPS/SOP/001), Annex G covers weapon-specific handling, clearing and maintenance procedures.</p> <p>Note: Seagull Maritime is transitioning its operational documentation to a new integrated management system framework. The Indian Ocean Region SOP (SM SOP — Indian Ocean, ref: SMS/SOP/IO/001) and its Annexes A–H replace the legacy Embarked Teams Manual (M-3001) and Embarked Team Procedures (SOP-3001) for IOR operations. Personnel who have completed training on the updated procedures via the company online learning platform operate under the current SOPs. Personnel deployed prior to training completion continue to operate under legacy procedures for an interim period, in compliance with ISO 28007:2015 requirements that all personnel shall be trained on current procedures before implementation. Both current and legacy SOPs are provided in the due diligence document pack for full transparency.</p> <p>Supporting Documentation: DD Portal Section 5 — Training: • SM SOP — Indian Ocean, Annex G • Training and Competency Procedure • MFCC certificate examples</p>

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
Training	5.6	Medical training to a recognised international standard.	Yes	<p>STCW A-VI/1-4 Advanced First Aid mandatory for designated team medics. All embarked personnel hold basic medical training. Trauma medical care certification required. Medical competency assessed and recertified annually. Records maintained in 1Clearview ERP.</p> <p>Supporting Documentation: DD Portal Section 5 — Training: • Training and Competency Procedure • BTMC/TMC and MSTM certificate examples</p>
Training	5.7	Contained in the training syllabus are appropriate sections and instruction in legal understanding of UNCLOS, STCW, SOLAS and UN Basis Principles on the use of force and firearms by law enforcement of	Yes	<p>Legal understanding forms part of the training syllabus including UNCLOS, STCW, SOLAS, ISPS Code, UN Basic Principles on the Use of Force and Firearms, ICOC-PSSP and VPSHR. Legal training is reinforced through the company online learning platform.</p> <p>Supporting Documentation: DD Portal Section 5 — Training: • Syllabus folder • Training and Competency Procedure</p>
Training (cont.)	5.8	Are PMSC company personnel given appropriate training and/or briefing with specific reference to the vessel type and where that vessel will be trading, including Pirate Action Group operations, tacti	Yes	<p>Pre-deployment briefings cover vessel-type-specific procedures and region-specific threat intelligence including:</p> <ul style="list-style-type: none"> • Pirate Action Group operations, tactics and behaviours • Industry Best Management Practices and Ship Self-Protection Measures • Relevant provisions of the vessel's Ship Security Plan and Security Levels • Vessel emergency procedures and contingency plans <p>Daily intelligence forecasts from our intelligence partnership provide ongoing operational context. LNG/LPG/Tanker-specific procedures (SOP-3002) provide additional vessel-type safety requirements.</p> <p>Note: Seagull Maritime is transitioning its operational documentation to a new integrated management system framework. The Indian Ocean Region SOP (SM SOP — Indian Ocean (SM/OPS/SOP/001), ref: SMS/SOP/IO/001) and its Annexes A–H replace the legacy Embarked Teams Manual (M-3001) and Embarked Team Procedures (SOP-3001) for IOR operations. Personnel who have completed training on the updated procedures via the company online learning platform operate under the current SOPs. Personnel deployed prior to training completion continue to operate under legacy procedures for an interim period, in compliance with ISO 28007:2015 requirements that all personnel shall be trained on current procedures before implementation. Both current and legacy SOPs are provided in the due diligence document pack for full transparency.</p> <p>Supporting Documentation: DD Portal Section 5 — Training: • SM SOP — Indian Ocean, Annex A • SOP-3002 LNG, LPG, Tankers Additional Procedure • Intelligence brief examples</p>
Training (cont.)	5.9	The PMSC has a process in place which involves documented periodic assessments of personnel performance. In addition to assessment of performance the process considers training/career development opportunities and recommendations.	Yes	<p>Performance assessment is embedded throughout the deployment cycle:</p> <ul style="list-style-type: none"> • Pre-deployment readiness assessment • Continuous onboard performance monitoring by Team Leader • End-of-mission debrief and team member assessment forms • Post Transit Report includes individual performance evaluation

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
				<p>Assessment results inform training and career development recommendations. Records maintained in 1Clearview ERP.</p> <p>Supporting Documentation: DD Portal Section 5 — Training: • Training and Competency Procedure • Team Member Assessment Form</p>

SECTION 6: ACCREDITATION

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
Accreditation by recognised association or industry body	6.1	The PMSC has attained relevant accreditation by a recognised security association or forum such as: Security in Complex Environments Group, International Code of Conduct for Private Security Service Providers, British Association of Private Security Companies and the International Marine Contractors Association.	Yes	<p>Seagull Maritime holds the following accreditations:</p> <ul style="list-style-type: none"> • ISO 28007:2015 — Ship and Marine Technology, Private Maritime Security Companies • ISO 28000:2022 — Security and Resilience, Security Management Systems • ISO 18788:2015 — Management System for Private Security Operations • ICoCA — International Code of Conduct (SM/INT/POL/002) Association, certified member and signatory • Flag state accreditations: Panama, Liberia, Malta and others <p>Supporting Documentation: DD Portal Section 6 — Accreditation: • ISO 28007 Certificate • ICoCA Certified Member Certificate • Flag approval folder</p>
Accreditation by recognised association or industry body	6.2	The PMSC has been endorsed by recognised associations and/or industry bodies. Endorsement may include Class, Flag, Ship-Owner Association, or ISO Quality Assurance Accreditations.	Yes	<p>Endorsed through ISO certifications (28007, 28000, 18788), ICoCA certification and multiple flag state approvals. Accreditation and endorsement documentation provided.</p> <p>Supporting Documentation: DD Portal Section 6 — Accreditation: • Accreditation folder • Flag approval folder • Flag approval examples</p>

SECTION 7: FLAG STATE APPROVAL

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
Flag State approval	7.1	The PMSC demonstrates sound knowledge of the various flag state approval requirements and limitations with regard to the carriage and onboard management of armed or unarmed private security contractors.	Yes	<p>The Flag State Requirements Register (SM/SEC/REG/001) tracks requirements for 37 flag states including approval types, documentation requirements, notification timelines, restrictions and carriage conditions.</p> <p>Working experience with: Panama, Malta, Singapore, Hong Kong, Marshall Islands, Liberia, Gibraltar, Antigua and Barbuda, Tuvalu, St Vincent and Grenadines, Bahamas and others.</p> <p>The External References and Standards Procedure (SM/INT/PRO/004) monitors flag state legislative developments.</p> <p>Supporting Documentation: DD Portal Section 7 — Flag State Approval: • SM/INT/PRO/004 External References and Standards Procedure • Flag approval folder</p>
Flag State approval	7.2	PMSC documented examples outlining previous Flag State approvals to operate onboard merchant vessels have been reviewed.	Yes	<p>15-year operational history with regular flag state approvals. Examples provided for review. Approvals tracked in 1Clearview ERP Task Management.</p> <p>Supporting Documentation: DD Portal Section 7 — Flag State Approval: • Flag approval examples</p>
Flag State approval	7.3	The PMSC is able to provide an example of a detailed plan covering proposed security team deployment to the Port/Coastal State to ensure compliance with the respective State's requirements on possession, transportation of weapons.	Yes	<p>All Seagull Maritime embarkation and disembarkation operations are conducted in full legal compliance with all applicable port and coastal state requirements. Agreements and declarations are held with port agents and local authorities at key operational ports. Company ERP tasking system sets out specific process items that must be completed. Available to view on audit.</p> <p>Supporting Documentation: DD Portal Section 7 — Flag State Approval: • Coastal suppliers and agents folder • Flag approval folder • Deployment plan examples</p>

SECTION 8: PORT AND COASTAL STATE APPROVAL

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
Port and Coastal State approval	8.1	The PMSC demonstrates sound knowledge in relevant port and coastal state approval requirements and limitations with regard to the transfer of security contractors and their equipment, especially firearms.	Yes	<p>Extensive operational experience across key HRA ports. The Legal and Regulatory Requirements Register (SM/HSE/REG/002) tracks port-specific requirements. Examples include:</p> <ul style="list-style-type: none"> • Mombasa — weapons must be disembarked to police storage and re-embarked when leaving port • South African ports — all weapons require a South African licence • Fujairah — guards and weapons not permitted in port; must disembark to floating armoury before entry <p>Local agents in all operational ports provide compliance guidance and coordination.</p> <p>Supporting Documentation: DD Portal Section 8 — Port and Coastal State Approval: • Coastal suppliers and agents folder</p>
Port and Coastal State approval (cont.)	8.2	The PMSC can provide documented evidence of recent/current agreements where they have obtained permission to embark/disembark security personnel and associated equipment (especially firearms) from/to key ports in region (Fujairah, Muscat, Salalah, Galle, Suez, Djibouti, etc.).	Yes	<p>All Seagull Maritime embarkation and disembarkation operations are conducted in full legal compliance. Agreements and declarations held with port agents and local authorities at key operational ports throughout the HRA.</p> <p>Supporting Documentation: DD Portal Section 8 — Port and Coastal State Approval: • Coastal suppliers and agents folder • Flag approval folder</p>
Port and Coastal State approval (cont.)	8.3	The PMSC is able to provide an example of a detailed plan covering proposed Security Team deployment to the Flag State to ensure compliance with the Flag State's requirements on possession and transportation of weapons (if so required).	Yes	<p>Deployment plans submitted to port/coastal state authorities per jurisdiction. Plans cover: vessel identification, flag state, route, team composition and certifications, weapons details (type, calibre, serial numbers), timeline, client authorisation and insurance certificate.</p> <p>Supporting Documentation: DD Portal Section 8 — Port and Coastal State Approval: • Deployment plan examples</p>


SECTION 9: INSURANCE

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
Insurance	9.1	The PMSC provides and maintains public and employer's liability insurance to a level expected by the ship owner (not expected to be less the US\$5 million).	Yes	Comprehensive maritime liability insurance maintained including third-party liability, professional negligence, client indemnification, incident investigation costs and legal defence costs. Annual insurance review conducted. Supporting Documentation: DD Portal Section 9 — Insurance: • Liability Insurance certificate
Insurance	9.2	The PMSC provides and maintains insurance covering personal accident, medical expenses, hospitalisation and repatriation of employees.	Yes	Insurance covers PMSC personnel for: personal accident, medical expenses, hospitalisation, disability/death from security operations, emergency medical treatment, medical evacuation and repatriation to home country. Coverage extends to all embarked PMSC personnel. Supporting Documentation: DD Portal Section 9 — Insurance: • Personal Accident Insurance certificate
Insurance	9.3	The PMSC ensures its personnel to carry and use firearms on the high seas and territorial waters, for accident, injury and damage arising from the use of firearms and liability for any claim that might arise from the carriage and use of firearms.	Yes	Insurance cover extends to the carriage and use of firearms in high-risk areas and territorial waters. Supporting Documentation: DD Portal Section 9 — Insurance: • Liability Insurance certificate • Personal Accident Insurance certificate

SECTION 10: CONTRACTUAL AGREEMENT

Item	Ref	Requirements & Expectations	Yes / No	Notes / Evidence
Contractual agreement	10.1	Any agreement contains a clearly worded indemnity clause removing liability for ship owner, operator, crew, and charterer for actions which may be a direct result of embarking private security contractors.	Yes	BIMCO GUARDCON standard contract is used as the basis for all service agreements. The GUARDCON includes a clearly worded indemnity clause. Master's authority is preserved — PMSC personnel operate under Master's direction within agreed rules of engagement. Supporting Documentation: DD Portal Section 10 — Contractual Agreement: • Sample BIMCO GUARDCON
Contractual agreement	10.2	Agreement confirms the minimum onboard security team compliment (industry guidelines state that this should be four) and that one team member will always be a qualified team medic.	Yes	BIMCO GUARDCON confirms minimum 4-person team with designated qualified medic. Medic qualification: STCW A-VI/1-4 Advanced First Aid or equivalent. Team complement may be increased based on threat assessment. Team composition tracked in deployment plan. Supporting Documentation: DD Portal Section 10 — Contractual Agreement: • Sample BIMCO GUARDCON
Contractual agreement	10.3	Onboard agreements re-iterate the chain of accountability and any non-disclosure agreement between PMSC personnel, the Master and the Administration in the event of damage/injury.	Yes	BIMCO GUARDCON specifies the chain of accountability: PMSC personnel to Team Leader to Master to company administration. Non-disclosure requirements cover vessel operations, cargo, crew, route, security procedures and incident details. Personnel acknowledge obligations in writing prior to embarkation. Supporting Documentation: DD Portal Section 10 — Contractual Agreement: • Sample BIMCO GUARDCON

SEAGULL SIGN-OFF

Name(s) of Reviewer(s)	Darren Watts	Date	02/04/2026
Role / Position	Group Compliance Director	Signature	

END OF DOCUMENT

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