



LEGAL AND REGULATORY COMPLIANCE PROCEDURE

Hazard Identification and Risk Assessment



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Supersedes	SMS/PRO/ERS/001 (legacy External References & Standards Procedure)

1. PURPOSE

This procedure establishes the process for identifying, accessing, evaluating, and maintaining compliance with legal requirements and other requirements applicable to the occupational health and safety management system of Seagull Maritime. It satisfies ISO 45001:2018 Clause 6.1.3 (Determination of legal requirements and other requirements) and Clause 9.1.2 (Evaluation of compliance).

This procedure ensures that Seagull Maritime maintains a current and auditable register of all applicable legal and regulatory requirements, systematically evaluates compliance, and responds to changes in legislation in a timely and controlled manner.

2. SCOPE

This procedure applies to all legal, statutory, and regulatory requirements applicable to Seagull Maritime operations across all jurisdictions in which Seagull entities operate or hold offices:

- United Arab Emirates (Dubai FZCO)
- United Kingdom (London office)
- Greece (Athens office)
- Nigeria (Lagos office)
- International requirements (IMO conventions, ISO standards, ICoC)

This procedure covers legal and regulatory requirements only. External voluntary standards and industry references are managed under SM/INT/PRO/004 (External References and Standards Procedure). Flag state requirements for PCASP are managed in SM/SEC/REG/001 (Flag State Requirements Register).

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3. REFERENCES

- ISO 45001:2018 – Occupational Health and Safety Management Systems (Clauses 6.1.3, 9.1.2)
- SM/HSE/REG/002 – Legal and Regulatory Requirements Register
- SM/SEC/REG/001 – Flag State Requirements Register
- SM/INT/REG/007 – External Standards and References Register
- SM/INT/PRO/004 – External References and Standards Procedure
- SM/INT/PRO/001 – Non-Conformance, OFI and Corrective Action Management
- SM/HSE/POL/001 – OH&S Policy
- SM/INT/DOC/002 – Context of the Organisation
- SM/HSE/REG/001 – Interested Parties Register

4. DEFINITIONS

Legal Requirement: Any obligation imposed by statute, regulation, code, or court order that applies to Seagull Maritime operations in any jurisdiction.

Other Requirement: Any obligation Seagull Maritime has chosen or agreed to comply with that is not a legal requirement, such as ISO standards, codes of conduct, or contractual obligations.

Compliance Evaluation: The systematic process of assessing whether Seagull Maritime meets the obligations of an identified legal or other requirement.

Legal Change Impact Assessment: The process of evaluating whether a change in legislation affects Seagull Maritime procedures, controls, or operations.

Competent Person: A person with sufficient knowledge of the legal landscape and the Seagull Maritime management system to conduct a compliance evaluation.

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5. ROLES AND RESPONSIBILITIES

5.1 Group Compliance Director

Owns this procedure and the Legal and Regulatory Requirements Register (SM/HSE/REG/002)

- Has primary responsibility for identifying applicable legal requirements across all jurisdictions
- Conducts or commissions compliance evaluations at the required frequency
- Assesses the impact of changes in legislation on the management system
- Escalates non-compliance or significant legal changes to the CEO
- Reports compliance status at management review

5.2 QHSE Manager (When appointed)

Supports the GCD in scheduling and tracking compliance evaluations

- Monitors for legislative changes through registered sources, websites, and industry forums
- Raises non-conformances where compliance gaps are identified
- Maintains evidence records for each compliance evaluation

5.3 Operations Managers

Notify the GCD or QHSE Manager of any new legal requirement identified through client engagement, audits, or operational activity

- Ensure operational procedures reflect current legal obligations
- Support compliance evaluations by providing operational evidence when required

5.4 All Workers

Report any legal or regulatory concern to their line manager or the GCD

- Follow procedures that have been established to meet legal requirements
- Participate in training on legal requirements relevant to their role

6. IDENTIFICATION OF LEGAL REQUIREMENTS

The Group Compliance Director has primary responsibility for identifying all legal and regulatory requirements applicable to Seagull Maritime. Identification is an ongoing process, not a one-time exercise.

6.1 Methods of Identification

The following methods shall be used to identify applicable legal requirements:

6.1.1 Registration with Regulatory Bodies

Seagull Maritime registers for email updates from relevant regulatory bodies in each jurisdiction. The GCD maintains a list of registered sources in the Legal Register.

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6.1.2 Monitoring of Official Sources

Official government and regulatory websites are monitored for changes to legislation. Key websites are recorded in SM/HSE/REG/002 for each jurisdiction.

6.1.3 Industry Intelligence

Industry publications, LinkedIn groups, professional networks, and trade associations are monitored for upcoming legislative changes.

6.1.4 Client and Audit Triggers

Client audits, due diligence processes, and external audits may identify new legal requirements. Commercial and Operations teams must notify the GCD of any such findings.

6.1.5 Internal Triggers

Internal audits, incident investigations, non-conformances, and management reviews may identify gaps in legal requirement identification. These are managed through SM/INT/PRO/001.

7. LEGAL AND REGULATORY REQUIREMENTS REGISTER

All identified legal requirements are recorded in SM/HSE/REG/002 (Legal and Regulatory Requirements Register). The register is organised by jurisdiction with separate tabs for International, United Kingdom, Greece, Nigeria, and UAE.

7.1 Register Content

For each legal requirement, the register records: the specific legislation or regulation, date of issue, last amendment, key requirement summary, applicable ISO clauses, applicability to personnel categories, responsible role, compliance status, objective evidence, review frequency, and last/next review dates.

7.2 Adding New Requirements

New requirements shall only be added by the Group Compliance Director. The GCD shall verify the requirement is applicable to Seagull Maritime, record it in the register, and assess compliance within 30 days of identification.

7.3 Removing Requirements

Requirements shall only be removed if the legislation has been repealed or if Seagull Maritime no longer operates in the relevant jurisdiction. Removed entries shall be recorded on an Archived tab.

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8. COMPLIANCE EVALUATION

Seagull Maritime shall evaluate compliance with identified legal requirements at the frequency specified in the register and in response to specific triggers.

8.1 Evaluation Frequency

Annual evaluation for each jurisdiction tab as a minimum. Quarterly evaluation for high-risk categories (firearms, export control, maritime security). Immediate evaluation upon notification of a change in legislation.

Rating	Likelihood	Description
1	Rare	Could occur only in exceptional circumstances. No history of occurrence within the company or similar operations.
2	Unlikely	Could occur but not expected. Has occurred in the wider maritime security industry but not within Seagull Maritime operations.
3	Possible	Could occur at some time. Has occurred previously within similar operations or there are known near misses.
4	Likely	Will probably occur in most circumstances. Has occurred within Seagull Maritime operations or similar companies in the last 12 months.
5	Almost Certain	Expected to occur in most circumstances. Has occurred repeatedly or conditions make occurrence highly probable.

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8.2 Evaluation Process

For each legal requirement, the evaluator shall: confirm the requirement is still current and applicable, review the objective evidence listed in the register, confirm the evidence is current and sufficient, record the compliance status (Compliant / Non-Compliant / Not Assessed), record the evaluation date and evaluator name.

Rating	Severity	Description
1	Negligible	No injury or very minor injury requiring no more than basic first aid. No lost time. No medical treatment required.
2	Minor	Minor injury requiring medical treatment but no hospitalisation. Up to 3 days lost time. Minor ill-health effects that are fully reversible.
3	Moderate	Injury requiring hospitalisation or extended medical treatment. Between 3 and 14 days lost time. Reversible health effects requiring ongoing monitoring.
4	Major	Serious injury causing long-term disability or permanent impairment. More than 14 days lost time. Irreversible health effects. Single fatality.
5	Catastrophic	Multiple fatalities or injuries with life-changing consequences to multiple persons. Mass casualty event.

8.3 Non-Compliance

Where a compliance evaluation identifies non-compliance, a non-conformance shall be raised under SM/INT/PRO/001 and tracked in the NCR Register (SM/INT/REG/004). Corrective actions shall be implemented within the timeframes specified in the NCR procedure.

Likelihood / Severity	1 - Negligible	2 - Minor	3 - Moderate	4 - Major	5 - Catastrophic
5 - Almost Certain	5	10	15	20	25
4 - Likely	4	8	12	16	20
3 - Possible	3	6	9	12	15
2 - Unlikely	2	4	6	8	10
1 - Rare	1	2	3	4	5

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9. RESPONSE TO LEGISLATIVE CHANGES

Risk Score	Rating	Required Action
1 - 4	Low	Acceptable risk. Monitor and review during scheduled assessments. No additional controls required unless reasonably practicable.
5 - 9	Moderate	Tolerable risk with monitoring. Review controls within 30 days. Consider additional measures to reduce risk further. Management awareness required.
10 - 16	High	Unacceptable without additional controls. Operations may proceed only with enhanced controls in place and documented approval from a competent person. Review within 7 days.
17 - 25	Critical	Unacceptable. Operations must not proceed until risk is reduced. Immediate escalation to the Group Compliance Director required. Senior management decision to proceed or suspend.

When a change in legislation is identified, the GCD shall conduct a Legal Change Impact Assessment to determine whether the change affects Seagull Maritime procedures, controls, or operations. The assessment shall consider: whether existing procedures need updating, whether new procedures or controls are required, whether training needs to be updated, whether risk assessments are affected, and whether clients need to be informed.

If the change requires action, the GCD shall update the register, revise affected documents through the Document Control Procedure, and communicate the change to affected personnel.

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10. COMMUNICATION OF LEGAL REQUIREMENTS

Relevant legal requirements and any changes shall be communicated to affected personnel through team briefings, the Emergent LMS training platform, toolbox talks, and direct communication from the GCD or QHSE Manager.

Priority	Control Type	Description	Maritime Example
1	Elimination	Remove the hazard entirely so it no longer exists.	Cancel a vessel transfer in sea state exceeding safe limits.
2	Substitution	Replace the hazard with something less dangerous.	Use a gangway system instead of a pilot ladder where feasible.
3	Engineering Controls	Isolate people from the hazard through physical means.	Install guard rails, non-slip deck surfaces, weapon storage lockers.
4	Administrative Controls	Change the way people work through procedures, training, signage, or scheduling.	Briefings before embarkation, rotation schedules to manage fatigue, toolbox talks.
5	PPE	Provide personal protective equipment as a last line of defence.	Body armour, life jackets, hard hats, safety boots, hearing protection.

External communication regarding legal compliance shall only be made by the GCD or with GCD approval.

11. REVIEW AND MONITORING

This procedure shall be reviewed annually and following any significant change in legislation, operations, or audit finding. The Legal and Regulatory Requirements Register shall be reviewed per the frequencies specified in Section 8.1.

Compliance evaluation outcomes shall be reported at management review. The management review shall consider: the overall compliance status across all jurisdictions, any non-conformances raised from compliance evaluations, the effectiveness of corrective actions taken, upcoming legislative changes that may affect the management system.

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12. RECORDS AND DOCUMENT CONTROL

The following records shall be maintained in accordance with the Control of Documents Procedure:

The Legal and Regulatory Requirements Register (SM/HSE/REG/002) including all updates and version history

Evidence of compliance evaluations conducted, including dates and evaluator

Legal Change Impact Assessments

Non-conformance reports raised from compliance evaluations

Communication records for legislative changes

Management review minutes where compliance status was reported

Records shall be retained for a minimum of three years after they are superseded or the requirement ceases to apply.