



CONTROL OF DOCUMENTS PROCEDURE

Control of Documents Procedure



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INTRODUCTION

This procedure defines the requirements for the storage, creation, review, approval, distribution, use and revision of management system documentation within Seagull Maritime.

This procedure applies only to documents important to the running of the management systems including manuals, policies, procedures, plans, work instructions, forms, and templates. Documents outside of this scope do not require control.

This procedure supersedes MSP-A-01 (Documents and Data Control), OHSP14 (Document & Data Control), SOP-1001 (Document Control and Records), and any previous document control procedures across all Seagull Maritime entities.

STORAGE

Soft copy documents are stored on the company Google Drive which is subject to real-time backup.

Hardcopy documents should be avoided for environmental conservation, where possible, but where necessary they are stored in a secured area and protected from deterioration.

When using hard copies, care must be taken to use the correct document version by consulting the Document Control Register (SM-INT-REG-001).

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PROCEDURE

Creation of Documents

Documents are created by an appropriate subject matter expert, typically the Group Compliance Director or a department manager.

All internal documents are created as soft files (MS Word®, etc.); it is recommended that files of a similar type follow a consistent format, whether to a company-provided template or a format already in use.

Draft versions must then be sent to the appropriate approver(s) for review and approval.

Original releases of documents are given a revision indicator of "001".

Review and Approval

Documents are to be approved by the Group Compliance Director.

Draft files may be sent to the approver(s) via hardcopy or softcopy, and any issues will be resolved to achieve a satisfactory version. Evidence that the document has been approved by the appropriate authority shall be maintained.

The Group Compliance Director, or delegated Compliance Administrator, upon approval, updates the Document Control Number Log, saves the document in the appropriate location, and backs up the current revision as a PDF file.

The Group Compliance Director maintains the Seagull Maritime Management System folder structure on the company Google Drive and ensures appropriate access permissions for all personnel.

Procedures and Policies

PDF copies of documents such as procedures are saved in the relevant shared folders of the department on the shared drive for all employees to access.

The controlled Word copies are stored in the management system folder structure. If a document requires amendment, the MS Word file will be edited and approved, and the PDF updated.

Forms

Forms, as default, will always be in Word format as they will require completion. Departments' relevant forms are stored on the shared drive for employee access.

If process owners or departments are required to edit a form, any edited document should then be sent to the Group Compliance Director for filing.

Any previous soft versions are then moved to the 'Archive' folder for obsolete documents which are kept for a minimum period of 3 years, unless otherwise specified.

The Document Register (SM-INT-REG-001) shall act as the master list of all controlled documents, indicating current version, status, location, and review dates.

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DOCUMENT REFERENCING CONVENTION

All management system documents follow the referencing convention SM/[SYSTEM]/[TYPE]/[SEQ] where:

SYSTEM identifies the management system area (SEC for Security, QMS for Quality, HSE for Health Safety and Environment, INT for Integrated, OPS for Operational, OFF for Seagull Offshore, SMS for Safety Management System).

TYPE identifies the document type (POL for Policy, PRO for Procedure, SOP for Standard Operating Procedure, MAN for Manual, RA for Risk Assessment, REG for Register, FORM for Form, RPT for Report, JD for Job Description, DOC for Document, ANN for Annex, CPP for Client Project Plan, SOW for Statement of Work, TPL for Template).

SEQ is a three-digit sequential number within each system and type combination.

File names use hyphens (e.g. SM-INT-PRO-001) while references within document text use slashes (e.g. SM/INT/PRO/001).

PROTECTION AND DISTRIBUTION OF DOCUMENTS

Controlled documents will be available via Google Drive for all employees. Employees will receive training upon joining the company, and periodically thereafter via the company's online training platform, on the management system structure, where to find documents, and the importance of using controlled versions.

Confidential documents must clearly be marked as such and protected from accidental or intentional release to unauthorised personnel.

All Word or soft copy documents are considered controlled and are not to be shared in this format.

PDF copies, printed or emailed copies are immediately deemed to be uncontrolled and the sharing party should verify they are working from the latest version before relying on the content.

RE-EVALUATION

Documents must be reviewed by the original author or another subject matter expert at the frequency defined in the Document Register (SM-INT-REG-001), or earlier if a change occurs that affects the document.

The Group Compliance Director will ensure re-evaluation is conducted and that documents are updated if required.

The Group Compliance Director, via the Document Register (SM-INT-REG-001), will maintain a record of document re-evaluation activities, including the date of review and any action taken.

If a document is determined to require updating, the changes shall be made, and a new version issued per the rules below.

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If a document is determined not to require updating, no action on the document is necessary.

REVISING DOCUMENTS

Changes to documents go through the same steps as original issue, except that their revision level is advanced upon approval.

Only authorized personnel may change documents, although any employee can request a change to their manager, or by filing a Non-Conformity Report. A change history is maintained via the Document Register.

Any changes to documents that require customer or regulatory authority review, and approval shall be submitted accordingly.

If document changes require customer or regulatory approval prior to implementation, this will be obtained in writing. This includes any required content, and format constraints that may exist.

Re-evaluation, inspection (where applicable) and internal auditing will confirm the effectiveness of changes.

CONTROLLING DOCUMENTS OF EXTERNAL ORIGIN

For external documents such as standards or third-party specifications which are referenced in a customer purchase order or contract, those particular documents must be controlled. Such control requires that the responsible manager obtain the latest version of the document and contact the Group Compliance Director to ensure the document is properly recorded.

For external documents such as standards or third-party specifications which are not referenced in a customer purchase order or contract, these must be controlled. Such control requires that the responsible manager obtain the latest version of the document and contact the Group Compliance Director to enter (or update) it on the External Standards and References Register. Like other controlled documents, these may not be edited or copied.

Third party specifications and prints, including those of the customer, are controlled by Managers as required for successful completion of the contract.

External documents for non-critical use, such as user manuals, reference books, marketing materials, and suppliers are not controlled.

For Seagull Maritime, controlled external documents include but are not limited to: applicable ISO standards (9001, 18788, 28007, 28000, 45001), IMO conventions (SOLAS, ISPS Code), flag state regulations and requirements, port state requirements, PCASP licensing requirements, client-specific contractual requirements, and regulatory permits. These are recorded on the External Standards and References Register. The Group Compliance Director is responsible for monitoring updates to external standards and regulations and ensuring the register remains current.

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FORMS

Forms are a special kind of document that may be copied as needed, but the original must always be taken from the management system folder on the company Google Drive.

Department managers are responsible for creating and using forms in their areas but must send a softcopy of any new or revised form to the Group Compliance Director for proper registration and filing.

RELATED DOCUMENTS

Document Register (SM-INT-REG-001)

External Standards and References Register

Non-Conformity Report Procedure

REVIEW

This procedure shall be reviewed at the frequency defined in the Document Register (SM-INT-REG-001), or earlier if a significant change occurs that affects document control practices within Seagull Maritime.

