



DUE DILIGENCE RESPONSE PROCEDURE

Due Diligence Response Procedure



Document Title	Due Diligence Response Procedure
Document Ref	SM/SEC/PRO/002
ISO Standard	ISO 28007:2015 / ISO 18788:2015
ISO Clauses	28007: 4.4.6 / 18788: A.4.3.2, A.9.3
Version	1.0
Classification	Internal
Effective Date	2 April 2026
Review Date	2 April 2027
Approved By	Darren Watts, Group Compliance Director Pavel Shparber, CEO
Supersedes	New document – first issue

1. PURPOSE

This procedure establishes the process for managing and responding to client due diligence requests received by Seagull Maritime. It defines responsibilities, quality controls, and delivery mechanisms to ensure consistent, accurate, and timely due diligence responses across all regions and operations.

The OCIMF PMSC Guidance Checklist and similar due diligence questionnaires are designed to be completed by the reviewing party (the client or their appointed auditor/CSO) during a structured review of the PMSC. Industry practice has evolved such that PMSCs are routinely asked to provide pre-populated responses on behalf of the reviewer. Seagull Maritime provides these responses as the auditee to assist the review process. This does not replace the obligation of the reviewing party to independently verify the information provided.

This procedure ensures that all due diligence responses are drawn from a single, approved source of truth, reviewed before release, and delivered through a controlled mechanism. No due diligence response shall be released without the approval of the Group Compliance Director (GCD).

2. SCOPE

This procedure applies to all due diligence requests received from clients, prospective clients, client-appointed auditors, CSOs, and any other party conducting a compliance review of Seagull Maritime. This includes:

- OCIMF PMSC Guidance Checklist responses (standard industry format)

- Bespoke or client-specific due diligence questionnaires

- Document pack requests (provision of supporting evidence)

- Pre-qualification submissions and compliance information requests

This procedure covers all operational regions including Indian Ocean Region (IOR), West Africa (WAF), and any future operational areas.

Due Diligence Response Procedure



This procedure does not cover Seagull Maritime due diligence conducted on third parties (suppliers, sub-contractors, VBA providers). Those activities are governed by the relevant supplier approval procedures.

3. REFERENCES

ISO 28007:2015 – Ships and Marine Technology: Private Maritime Security Companies (Clause 4.4.6)

ISO 18788:2015 – Management System for Private Security Operations (Clauses A.4.3.2, A.9.3)

ISO 28000:2022 – Security and Resilience: Security Management Systems

ISO 9001:2015 – Quality Management Systems

OCIMF PMSC Guidance (Appendix A: Due Diligence Checklist)

BMP-MS – Best Management Practices to Enhance Maritime Security

SM/SEC/DOC/001 – OCIMF PMSC Due Diligence Checklist: Master Responses

SM/INT/PRO/002 – Control of Documents

SM/INT/REG/001 – Document Register

SM/SEC/REG/001 – Flag State Requirements Register

SM/INT/REG/007 – External Standards and References Register

Seagull Maritime Due Diligence Document Portal (portals.seagullmaritimeltd.com/dd/)

4. DEFINITIONS

Due Diligence (DD): The process by which a client, prospective client, or their appointed representative reviews the compliance, capability, and suitability of a PMSC prior to entering into or renewing a service agreement. In the PMSC context, this typically takes the form of a structured questionnaire with supporting document review.

CSO (Company Security Officer): The client-side representative responsible for conducting or commissioning due diligence reviews of PMSCs. In practice, CSOs may be employed by the ship owner/operator or contracted independently to conduct the review.

OCIMF (Oil Companies International Marine Forum): The industry body that publishes the standard PMSC due diligence guidance checklist used across the maritime security sector.

DD Pack: The collection of supporting documents (policies, procedures, certificates, evidence) provided alongside questionnaire responses to demonstrate compliance.

Master Response Documents: SM/SEC/DOC/001 (IOR) and SM/SEC/DOC/002 (WAF), the approved sources of pre-populated answers to the standard OCIMF PMSC due diligence checklist for each operational region. All standard responses are drawn from these documents.

DD Portal: The Seagull Maritime Due Diligence Document Portal, a secure web-based platform for delivering due diligence documentation to clients. IOR portal: portals.seagullmaritimeltd.com/dd/. WAF portal: portals.seagullmaritimeltd.com/dd/waf/.

Due Diligence Response Procedure



5. ROLES AND RESPONSIBILITIES

5.1 Group Compliance Director (GCD)

Owns this procedure and the Master Response Documents (SM/SEC/DOC/001 for IOR, SM/SEC/DOC/002 for WAF).

Maintains and updates the master responses as new documents are created or existing documents are revised

Reviews and approves all due diligence responses before release to any client

Adapts master responses for bespoke or client-specific questionnaires

Manages the DD portal content and ensures all hosted documents are current

Makes the final determination on any response where the standard answer requires amendment or qualification

Conducts quarterly review of master responses and DD pack currency

5.2 Compliance Administrator

Supports the GCD in compiling and delivering due diligence responses.

Compiles document packs from the DD portal and management system folders

Checks document currency before compilation: ISO certificate dates, insurance expiry, flag approval status

Formats completed questionnaires for client delivery (PDF conversion, file naming)

Logs all DD requests and tracks response status

Updates the DD portal when instructed by the GCD

The Compliance Administrator shall not release any due diligence response or document pack to a client without GCD approval. The Compliance Administrator shall not draft, amend, or improvise answers to due diligence questions. All responses must be drawn from the approved master document or provided directly by the GCD.

5.3 Commercial Team

Receives due diligence requests from clients and routes them to Compliance.

Forwards all DD requests to the Compliance team immediately upon receipt, including the client name, deadline, and any specific instructions

Provides the DD portal link and access code to clients when instructed by Compliance

Sends the completed DD response to the client via email when the pack is approved and ready

Does not attempt to answer due diligence questions, compile document packs, or provide compliance information independently

The DD portal link and current access code are available at all times. The Commercial team shall not request these from Compliance for each individual DD request. The portal link does not change. Access codes rotate weekly and follow the published format.

5.4 CEO

Provides strategic oversight and is available to participate in client due diligence audits where face-to-face meetings or senior management engagement is required.

6. DUE DILIGENCE REQUEST RECEIPT AND LOGGING

All due diligence requests shall be forwarded to the Compliance team immediately upon receipt. The Commercial team member receiving the request shall email the request to the Compliance team with the following information:

Client name and requesting contact

Date received and client deadline (if stated)

Type of request: standard OCIMF checklist, bespoke questionnaire, document pack only, or pre-qualification

Region: IOR, WAF, or multi-region

Any specific instructions or focus areas stated by the client

The Compliance Administrator shall log the request in the DD tracker, recording the date received, client, type, assigned handler, and target response date.

Target response times are as follows: standard OCIMF checklist with current master responses available, 24 hours; bespoke questionnaire requiring GCD input, 72 hours; document pack only via portal link, same day. These are internal targets. Where a client specifies a shorter deadline, the GCD shall be informed immediately.

7. RESPONSE PREPARATION

7.1 Standard OCIMF Responses

For standard OCIMF PMSC Guidance Checklist requests, the approved responses are contained in SM/SEC/DOC/001 (IOR) or SM/SEC/DOC/002 (WAF). The Compliance Administrator shall:

- Retrieve the current version of the applicable master response document (SM/SEC/DOC/001 for IOR or SM/SEC/DOC/002 for WAF)
- Run the pre-release currency check (Section 7.3)
- Submit the completed checklist to the GCD for approval
- The master document contains pre-populated responses for all OCIMF checklist sections. These responses reference the current DD portal structure and document filenames. No answer shall be amended, removed, or added without GCD authorisation.

7.2 Bespoke Questionnaire Responses

For client-specific or non-standard questionnaires, the Compliance Administrator shall first identify questions that match or substantially overlap with existing OCIMF master responses and copy the approved answers directly from SM/SEC/DOC/001. Only questions that are unique and fall outside the scope of existing master responses require GCD input. The GCD shall draft new responses for these unique questions and, where appropriate, add them to the master document for future use. Where a bespoke questionnaire is received, the client may be advised that Seagull Maritime's standard OCIMF responses and supporting documentation can be submitted in the interim to assist their review while the bespoke elements are being addressed.

The Compliance Administrator shall not attempt to draft or improvise answers to unique bespoke questions independently. For questions matching existing master responses, the Compliance Administrator may copy directly. All unique bespoke responses shall be drafted or approved by the GCD.

7.3 Pre-Release Currency Check

Before any DD response is submitted for approval, the following currency checks shall be completed:

- ISO certificates: confirm all certificates are within their validity period and match the current certification scope
- Insurance policies: confirm all insurance documents are current and renewal dates have not passed
- Flag state approvals: confirm current annual approvals (Panama, Liberia, etc.) are valid
- Company profile: confirm the current version is in the DD pack
- Any document referenced in the response that has been updated since the last DD submission

If any document has expired, been superseded, or is pending renewal, the GCD shall be notified before the response is submitted. Expired documents shall not be included in any DD pack.

8. DOCUMENT PACK ASSEMBLY

8.1 DD Portal

The primary delivery mechanism for due diligence documentation is the Seagull Maritime DD Portal. The IOR portal (portals.seagullmaritimeltd.com/dd/) and WAF portal (portals.seagullmaritimeltd.com/dd/waf/) each host all supporting documents referenced in their respective master responses, organised by the standard 10-section DD folder structure.

The portal is access-controlled with rotating weekly codes. Internal staff can calculate the current code from the date. The GCD manages portal content. Documents on the portal shall always be the current approved versions per the Document Register (SM/INT/REG/001).

8.2 Standard DD Pack Contents

The standard DD pack follows the OCIMF 10-section structure:

Section 1: Company Registration and Information (company profile, org chart, registration certificates, ownership documents, bank references)

Section 2: Compliance and Accreditation (ISO certificates, flag approvals, ICoCA membership, compliance registers)

Section 3: Standard Operating Procedures (embarked team procedures, tanker additional procedure, standing orders)

Section 4: Rules on the Use of Force (RUF policy and procedures)

Section 5: Management Procedures (document control, records, communications, command and control, NCR, corrective action, risk assessment, crisis response, emergency procedures, incident management)

Section 6: Personnel Management (recruitment and screening procedures, training procedures, syllabus, example personnel files)

Section 7: Weapons Management (weapons procedures, end-user certificates, export licences, weapons register)

Section 8: Company Policies and Procedures (all current policies)

Section 9: Insurance (liability insurance, personal accident insurance)

Testimonials will be made available on request as no current ones are available at time of writing.

Due Diligence Response Procedure



The GCD shall maintain a controlled list of which documents appear in each section. When a new document is created that replaces or supplements an existing DD pack document, the GCD shall update the portal and master responses accordingly.

8.3 Region-Specific Packs

Each operational region maintains its own DD portal and master response document. The IOR portal and SM/SEC/DOC/001 cover the Indian Ocean Region. The WAF portal and SM/SEC/DOC/002 cover West Africa. Where a client operates across multiple regions, the GCD shall determine which portal and master responses are applicable and whether a combined response is required.

9. QUALITY REVIEW AND APPROVAL

Every due diligence response, regardless of type or urgency, shall be reviewed and approved by the GCD before release. This includes:

Standard OCIMF responses using the master document (currency check confirmation required)
Bespoke questionnaire responses (full content review required)
Document packs assembled for direct delivery (contents check required)
The GCD shall confirm that all responses are accurate, all referenced documents are current, and all documents in the pack are the correct versions. The GCD shall record approval by email or in the DD tracker.

No due diligence response shall be released to any client without this approval. This requirement applies to all staff, including the Compliance Administrator, Commercial team, and Operations managers. Urgency does not override this requirement. If the GCD is unavailable, the response shall wait until the GCD is available to review it.

10. DELIVERY TO CLIENT

Due diligence responses shall be delivered through one of the following methods:

DD Portal: The preferred method. The Commercial team provides the client with the portal link and current access code. The portal gives the client direct access to all supporting documents alongside the completed questionnaire.

Email with Attachments: Where the client specifically requests email delivery or the portal is not suitable (e.g. client IT restrictions), the completed questionnaire and supporting documents shall be sent by the Commercial team with Compliance in copy.

The Commercial team is responsible for sending the final delivery email to the client. Compliance provides the content. The delivery email shall include the Seagull Maritime DD portal link for the client to access the full document library at any time.

Where Seagull Maritime is providing pre-populated responses (rather than hosting an in-person review), the delivery email shall include a statement to the effect that responses are provided by Seagull Maritime as the auditee to assist the review process and should be independently verified by the reviewing party.

Due Diligence Response Procedure



11. REVIEW AND CONTINUOUS IMPROVEMENT

The GCD shall review the master response documents (SM/SEC/DOC/001 and SM/SEC/DOC/002) and DD portal contents:

Quarterly, to confirm all responses and documents remain current

Whenever a new document is created or an existing document is revised that is referenced in DD responses

Following any client feedback, failed due diligence review, or audit finding related to DD content
Lessons from client feedback, recurring questions, or areas where bespoke responses are frequently required shall be captured and used to improve the master responses.

This procedure shall be reviewed annually and following any significant change in operational scope, certification status, or client requirements.

12. RECORDS AND DOCUMENT CONTROL

The following records shall be maintained in accordance with the Control of Documents Procedure (SM/INT/PRO/002):

- DD request log: record of all requests received, dates, clients, type, handler, response date, approval
- Master Response Documents (SM/SEC/DOC/001 and SM/SEC/DOC/002): version-controlled, all updates recorded
- DD portal access logs and update history
- Client delivery emails with completed questionnaires attached or portal link provided
- GCD approval records for each DD response released
-

Records shall be retained for a minimum of three years after the associated contract or client relationship ends, or three years after the record is superseded, whichever is later.