

Environmental, Social and Governance (ESG) Policy



Document Title	Environmental, Social and Governance (ESG) Policy
Document Ref	SM/INT/POL/011
ISO Standard	ISO 9001:2015 / ISO 45001:2018 / ISO 18788:2015 / ISO 28007:2015 / ISO 28000:2022
Version	1.0
Classification	Internal
Effective Date	17 April 2026
Review Frequency	As per Document Register defined review date, or upon significant change
Owner	Group Compliance Director
Approved By	Pavel Shparber, CEO / Darren Watts, Group Compliance Director
Applicable Entities	Seagull Maritime FCZO, Seagull Maritime Malta, Seagull Maritime Nigeria, Seagull Maritime UK, Seagull Offshore

INTRODUCTION

Seagull Maritime recognises that Environmental, Social and Governance (ESG) principles are fundamental to how we conduct business as a provider of maritime security services. This policy sets out our commitment to ESG as a strategic and operational priority.

This policy is foundational and will evolve in scope and measurement depth as ESG expectations mature and as the Company's reporting capability develops. It supports the Company's obligations under ISO 45001, ISO 18788, ISO 28000, ISO 28007, the ICoCA Code of Conduct, and the Voluntary Principles on Security and Human Rights (VPSHR).

SCOPE & DEFINITIONS

This policy applies to:

- All employees and staff
- Privately Contracted Armed Security Personnel (PCASP) deployed on client vessels
- Security Escort Vessel (SEV) crew operating in West Africa
- Contractors, subcontractors, and agency personnel
- Consultants and any individual representing the Company

Hereafter referred to as "personnel" for the purposes of this policy.

It applies to all operations conducted under the Company's name – vessel-based, shore-based, in transit, and within the supply chain that supports those operations.

Environmental, Social and Governance (ESG) Policy



RESPONSIBILITIES

All personnel are responsible for conducting themselves in line with this policy and the associated policies referenced.

Managers are responsible for ensuring that their teams are aware of this policy and for embedding ESG considerations into operational and commercial decisions within their remit.

The Group Compliance Director owns this policy, coordinates ESG reporting development, and ensures integration with the Management System.

The Chief Executive Officer holds ultimate accountability for ESG performance and reviews progress at each Management Review.

OUR COMMITMENT

Seagull Maritime commits to operating as a responsible maritime security services provider. The Company recognises that how services are delivered matters as much as that they are delivered.

This policy supports the Company's commitments under:

- ISO 45001:2018 – Occupational Health and Safety Management Systems
- ISO 18788:2015 – Private Security Operations Management
- ISO 28000:2022 – Security and Resilience for the Supply Chain
- ISO 28007:2015 – Maritime Security Company Guidelines
- The Voluntary Principles on Security and Human Rights (VPSHR)
- The International Code of Conduct for Private Security Service Providers (ICoCA)
- The Montreux Document on Private Military and Security Companies

ENVIRONMENTAL COMMITMENTS

Seagull Maritime operates on client vessels and in coastal regions where environmental responsibility is both direct and indirect. The Company commits to:

- Minimising fuel consumption and emissions through efficient transit planning and responsible operational practices
- Proper disposal of waste generated during deployments, including weapons cleaning residues, spent materials, and personal effects, in accordance with MARPOL and flag state requirements
- Encouraging clients and vessel operators to adopt environmentally responsible practices within our sphere of influence
- Responsible office operations – reduced energy consumption, minimised paper use, and phased reduction of single-use plastics at company premises
- Supplier and subcontractor vetting that considers environmental performance where material

These commitments complement the standalone Environmental Policy (SM/HSE/POL/002).

Environmental, Social and Governance (ESG) Policy



SOCIAL COMMITMENTS

Seagull Maritime delivers armed security operations globally. The social dimension of our business is inseparable from human rights responsibility. The Company commits to:

- Full implementation of the Voluntary Principles on Security and Human Rights across all operations
- Adherence to the ICoCA Code of Conduct and the Montreux Document
- Respect for the dignity, safety, and rights of every person who interacts with our operations – employees, clients, host communities, detainees, and third parties
- Fair and lawful employment practices – equal opportunities, fair pay, safe working conditions, no discrimination
- Active engagement with host communities in operational regions, particularly the Indian Ocean and West Africa Gulf of Guinea
- Protection of personnel wellbeing – physical, mental, and rehabilitative support where required

These commitments are operationalised through the Code of Conduct (SM/INT/POL/002), Human Rights Policy (SM/SEC/POL/002), Equal Opportunities Policy (SM/INT/POL/003), and related HR and operational policies.

GOVERNANCE COMMITMENTS

Governance in the PMSC sector requires transparency, ethical business conduct, and operational integrity. The Company commits to:

- Zero tolerance for bribery, corruption, and facilitation payments (SM/INT/POL/001)
- Full compliance with applicable international sanctions regimes – including US (OFAC), UK (FCDO), EU, and UN – embedded in client engagement, supplier due diligence, and screening workflows (SM/INT/POL/012)
- Declaration and active management of conflicts of interest affecting impartiality or integrity of business decisions (SM/INT/POL/013)
- Clear CEO and Group Compliance Director accountability for Management System performance
- Regular internal audit and management review cycles in line with ISO 45001 Cl. 9 and ISO 18788
- Transparent whistleblowing and grievance mechanisms available to all personnel and third parties (SM/INT/POL/004)
- Honest and accurate reporting to clients, certification bodies, and authorities – no concealment of findings, incidents, or nonconformities

IMPLEMENTATION AND REVIEW

This is a foundational ESG policy. Formal ESG measurement and reporting will develop progressively, drawing initially on the metrics and processes already operating under ISO 45001, ISO 18788, and ISO 28007. The Company anticipates future evolution including:

- Formal ESG key performance indicators and annual reporting
- Alignment with UN Sustainable Development Goals (SDGs) relevant to maritime security services
- Client-requested ESG assessments and third-party ESG audits
- Expansion of environmental metrics relevant to armed maritime security operations

Environmental, Social and Governance (ESG) Policy



ESG performance is monitored via the Company Objectives Register (SM/INT/REG/006) and reviewed at each Management Review.

RELATED DOCUMENTS

- SM/INT/POL/001 – Anti-Bribery, Corruption and Business Ethics Policy
- SM/INT/POL/002 – Code of Conduct
- SM/INT/POL/003 – Equal Opportunities Policy
- SM/INT/POL/004 – Grievance and Whistleblowing Policy
- SM/HSE/POL/001 – Occupational Health & Safety Policy
- SM/HSE/POL/002 – Environmental Policy
- SM/SEC/POL/002 – Human Rights Policy
- SM/INT/POL/012 – Sanctions Policy
- SM/INT/POL/013 – Conflict of Interest Policy
- SM/INT/REG/006 – Company Objectives Register

CONTACT INFORMATION

Any questions or concerns about this policy should be directed to the Group Compliance Director.

REVIEW

This Policy is reviewed by the top management of Seagull Maritime at planned intervals (at least annually), or upon significant change to Company operations, ownership, or the external ESG environment.

Regular review assists the evaluation and continual improvement of our ESG commitments and associated processes.

A handwritten signature in black ink, appearing to read "Darren Watts".

Darren Watts

Group Compliance Director

17/04/2026