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# OCIMF PMSC GUIDANCE CHECKLIST

## WEST AFRICA REGION

Seagull Maritime Ltd

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Document Ref: SM/SEC/DOC/002 | Version 1.0 | Effective Date: 04 April 2026

**Classification: COMMERCIAL IN CONFIDENCE**

<b>Document Title</b>	OCIMF PMSC Guidance Checklist — West Africa Region
<b>Document Reference</b>	SM/SEC/DOC/002
<b>Version</b>	1.0
<b>Effective Date</b>	04 April 2026
<b>Classification</b>	Commercial in Confidence
<b>Prepared By</b>	Darren Watts, Group Compliance Director
<b>Approved By</b>	Pavel Shparber, Chief Executive Officer
<b>Review Frequency</b>	Quarterly (or when referenced documents change)
<b>Next Review</b>	July 2026
<b>Region</b>	West Africa (Nigerian EEZ)
<b>Applicable Standards</b>	ISO 28007, ISO 18788, ISO 9001, ISO 45001 (pending), ICoCA

<b>PMSC Name</b>	Seagull Maritime Ltd	<b>Registered Address</b>	64 "Excalibur", B Bontadini Street, Birikirkara BKR1737, Malta		
<b>Region</b>	West Africa (Nigerian EEZ)	<b>Prepared By</b>	Darren Watts, GCD	<b>Date</b>	04/04/2026
<b>Total Questions</b>	52	<b>Answered</b>	52	<b>TBC</b>	0

### Section 1: General Information & Certifications

Item	Ref	Requirements & Expectations	Status	Seagull Response
1.1	1.1	Does the PMSC possess valid business registration certificates?	Answered	Yes. Seagull Maritime Ltd incorporated in Malta (C 86498). Maritime Services Ltd (Nigeria) incorporated under CAC. <b>Supporting Documentation:</b> SM/INT/DOC/004, CAC Certificate, MOA (Malta & Nigeria), TCC — DD Portal S1
1.2	1.2	Does the PMSC possess a valid Navy MOU?	Answered	Yes. MOU between Seagull/Maritime Services Ltd and Nigerian Navy obtained 2025, renewed. <b>Supporting Documentation:</b> Navy MOU — DD Portal S1
1.3	1.3	Has the PMSC re-applied for new MOU?	Answered	Current MOU is valid and in effect. Renewal is managed by the Nigeria Country Manager and maintained as a controlled document within the company management system. <b>Supporting Documentation:</b> Navy MOU — DD Portal S1
1.4	1.4	Does the PMSC have a valid NSCDC Licence (Category B)?	Answered	Yes. Valid NSCDC licence held by Maritime Services Ltd (Nigeria). <b>Supporting Documentation:</b> NSCDC Certificate — DD Portal S1
1.5	1.5	Does the PMSC have a valid NIMASA Certificate?	Answered	Yes. NIMASA RSO certificate held. <b>Supporting Documentation:</b> NIMASA Certificate — DD Portal S1
1.6	1.6	Does the PMSC have a valid DPR Permit?	Answered	Yes. DPR permit to operate as oil industry service company. <b>Supporting Documentation:</b> Oil & Gas Permit (DPR) — DD Portal S1

1.7	1.7	Is the PMSC certified to ISO 28007?	Answered	Yes. ISO 28007 certification held by Seagull Maritime Ltd (Malta). Note: ISO standards apply to Malta entity; Nigerian Navy operations are government-regulated. ISO 45001 certification in progress — will be added to DD portal upon receipt of certificate. <b>Supporting Documentation:</b> SM/SEC/POL/001, ISO Certificate — DD Portal S2
1.8	1.8	Is the PMSC certified to ISO 9001?	Answered	Yes. ISO 9001:2015 certified. <b>Supporting Documentation:</b> ISO Certificate — DD Portal S2
1.9	1.9	Is the PMSC certified to ISO 18788?	Answered	Yes. ISO 18788:2015 certified (Malta entity). Nigerian entity operates under group management system. <b>Supporting Documentation:</b> ISO Certificate — DD Portal S2
1.10	1.10	Did the PMSC sign ICoC-PSSP?	Answered	Yes. Seagull Maritime is an ICoCA member. Also member of MASPAN. <b>Supporting Documentation:</b> ICoCA Membership, MASPAN Certificate — DD Portal S2
1.11	1.11	Is the structure clearly defined?	Answered	Yes. Corporate structure documented including Malta holding entity, Nigerian operational entity, and group management structure. <b>Supporting Documentation:</b> SM/INT/DOC/004, Corporate Structure & Organisation Chart — DD Portal S1
1.12	1.12	Does the PMSC have a mission/vision statement?	Answered	Yes. Documented in company policies and Company Profile. <b>Supporting Documentation:</b> SM/INT/DOC/004 — DD Portal S1
1.13	1.13	Does policy reflect company position on safety, health, employment?	Answered	Yes. Comprehensive policy framework: OH&S (SM/HSE/POL/001), Security (SM/SEC/POL/001), Human Rights (SM/INT/POL/004), Anti-Bribery (SM/INT/POL/003), Drug & Alcohol (SM/INT/POL/005), Quality (SM/QMS/POL/001). <b>Supporting Documentation:</b> 17 Policies — DD Portal S4
1.14	1.14	Does the PMSC use own weapons?	Answered	No. In Nigeria, weapons and embarked personnel belong to Nigerian Navy (HNF). Weapons remain under Naval chain of command. Seagull Maritime operates under RUF framework, not ROE. <b>Supporting Documentation:</b> SM/OPS/PRO/001, MOU — DD Portal S2
1.15	1.15	24-hour emergency support available?	Answered	Yes. 24/7 operations capability maintained through the WAF Operations Director and Nigeria Country Manager. <b>Supporting Documentation:</b> SM/OPS/SOP/002 — DD Portal S2
1.16	1.16	Senior management face-to-face discussions?	Answered	Yes. Regular engagement by CEO (Pavel Shparber) and WAF Operations Director (Christoforos Antzoulatos). GCD engages on compliance. <b>Supporting Documentation:</b> Meeting Records — Management Files
1.17	1.17	Access to maritime legal advice 24/7?	Answered	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. <b>Supporting Documentation:</b> Legal Services Retainer — Corporate Files
1.18	1.18	Escort boat NN approved with Pennant Number?	Answered	Yes. All SEVs verified through SM/SEC/PRO/004 approval process. Each holds valid confidential Pennant Number. <b>Supporting Documentation:</b> SM/SEC/PRO/004, SEV Register — DD Portal S3
1.19	1.19	Escort boat equipped with mounted weapons?	Answered	Yes. As per MOU Article 7.1, all escort vessels equipped by Nigerian Navy. Weapon configurations under Naval authority. <b>Supporting Documentation:</b> MOU, SEV Specifications — DD Folder

1.20	1.20	Is 3rd party and personnel insurance valid?	Answered	Yes. Comprehensive insurance cover maintained. <b>Supporting Documentation:</b> Insurance Certificates — DD Portal S8
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## Section 2: Knowledge & Experience

Item	Ref	Requirements & Expectations	Status	Seagull Response
2.1	2.1	Established in Nigerian maritime security for 2+ years?	Answered	Yes. Maritime Services Ltd has been operational in Nigerian waters for over 5 years. Seagull Maritime group has extensive maritime security experience across both West Africa and the Indian Ocean Region. <b>Supporting Documentation:</b> Corporate Records — Company Profile
2.2	2.2	Does the PMSC use subcontractors?	Answered	Yes. Seagull Maritime uses approved SEV providers (subcontractors). All evaluated under SM/SEC/PRO/005. Current approved: SR Platforms Limited, Seakey Marine, Seaquest Energy. Each provider's MOU verified. <b>Supporting Documentation:</b> SM/SEC/PRO/005, Supplier Register — DD Portal S3
2.3	2.3	Written testimonials available?	Answered	Client testimonials and engagement references are available on request. Please contact Seagull Maritime directly for details of previous and current client engagements. <b>Supporting Documentation:</b> Client References — DD Portal S10 (on request)
2.4	2.4	Monthly escort voyages?	Answered	Yes. Average of 65+ escort voyages per month across the West Africa region. <b>Supporting Documentation:</b> Operations Records — Operational Files

## Section 3: Operational Procedures

Item	Ref	Requirements & Expectations	Status	Seagull Response
3.1	3.1	Documented procedures for vessel protection in Nigerian EEZ?	Answered	Yes. SM/OPS/SOP/002 West Africa SEV Operations v1.0. Covers deployment nomination through escorting to demobilisation. Nigerian-specific. <b>Supporting Documentation:</b> SM/OPS/SOP/002 — DD Portal S3
3.2	3.2	Written chain of authority procedures?	Answered	Yes. Chain of command: WAF Ops Director → Operations Manager → Master of Armed SEV → Naval Team Leader. MSLO deploys as communications bridge. <b>Supporting Documentation:</b> SM/OPS/SOP/002, SOP-002-A — DD Portal S3
3.3	3.3	Personnel trained on RUF/ROE?	Answered	RUF is policy only and applicable only to Private Security Companies (PSCs) and Private Maritime Security Companies (PMSCs). Local Naval Teams will employ their military Rules of Engagement in response to any threat or attack. Prior to deployment of local forces, Seagull Maritime will present our company's Human Rights and Security Operations policies and local forces personnel are respectfully asked to comply as best as possible with the company's procedures as best practices and the respect for human life. <b>Supporting Documentation:</b> SM/SEC/POL/002 (Human Rights Policy), SM/SEC/POL/001 (Security Policy) — DD Portal S4

3.4	3.4	RUF detached from Master?	Answered	Yes. Master does not govern escort vessel actions. RUF/actions under Naval chain of command. Reflected in contracts. <b>Supporting Documentation:</b> SM/OPS/SOP/002, Guardcon Contract — DD Portal S3
3.5	3.5	Personnel do not use firearms except in self-defence?	Answered	Seagull Maritime MSLOs remain unarmed. Local Naval Teams operate under their own military Rules of Engagement. Prior to each deployment, Seagull Maritime presents its Human Rights and Security Operations policies to all local forces personnel, emphasising respect for human life and proportionate response. <b>Supporting Documentation:</b> SM/SEC/POL/002 (Human Rights Policy), SM/OPS/SOP/002 — DD Portal S3, DD Portal S4
3.6	3.6	Rationale for selected escort boat and firearms?	Answered	Escort boats selected per MOU Articles 7–8. All vessels NN approved. Selection based on operational requirements and vessel capability assessment (SM/SEC/PRO/004). <b>Supporting Documentation:</b> SM/SEC/PRO/004, MOU — DD Portal S3
3.7	3.7	Minimum team/armed members on escort vessel?	Answered	Team composition is as requested by the client or as supplied by Nigerian Naval Forces. Minimum of 6 armed Naval personnel per escort vessel is typical. Exact composition confirmed on a task-by-task basis. <b>Supporting Documentation:</b> MOU, SEV Specifications — Operational Files
3.8	3.8	Full compliance with MOU articles?	Answered	Yes. Seagull Maritime confirms full compliance with all articles of Nigerian Navy MOU. <b>Supporting Documentation:</b> MOU, Compliance Records — DD Folder
3.9	3.9	Incident investigation procedures?	Answered	Yes. SM/INT/PRO/006 Incident and Crisis Management v1.0. Route analysis and lessons learned captured. Reporting via Safety App (report.seagullmaritimeltd.com). <b>Supporting Documentation:</b> SM/INT/PRO/006, Safety App — DD Portal S3
3.10	3.10	Safe custody procedures for detained individuals?	Answered	Yes. Covered in WAF SEV SOP. Any detention managed under Naval authority with MSLO documentation. <b>Supporting Documentation:</b> SM/OPS/SOP/002 — DD Portal S3
3.11	3.11	Post-deployment report process?	Answered	Yes. Documented post-deployment reporting including Masters Feedback Report. <b>Supporting Documentation:</b> SM/OPS/SOP/002, Report Templates — DD Portal S3

#### Section 4: Employee Screening & Recruitment

Item	Ref	Requirements & Expectations	Status	Seagull Response
4.1	4.1	Where are personnel recruited and what screening is applied?	Answered	Embarked armed personnel are Nigerian Navy — recruited, vetted, and deployed by the Nigerian Navy. MSLOs are recruited under the PCASP Recruitment & Screening procedure (SM/INT/PRO/008). Seagull operational and management staff are recruited under procedures as documented in the company management systems. <b>Supporting Documentation:</b> SM/INT/PRO/008 — DD Portal S7

Section 5: Training & Competence				
Item	Ref	Requirements & Expectations	Status	Seagull Response
5.1	5.1	Documented training programme for all personnel?	Answered	Yes. Seagull provides structured training and briefings for all operational personnel. Nigerian Navy personnel receive military training through the Navy. Seagull training programme includes Human Rights training aligned with VPSHR and ICoCA principles (SM/TRG/DOC/001 for PCASP, SM/TRG/DOC/002 for staff and management). Example slides from both courses are provided in the DD portal. Full training and competence matrix maintained internally (SM/INT/REG/008). <b>Supporting Documentation:</b> SM/TRG/DOC/001, SM/TRG/DOC/002 (example slides) — DD Portal S7
5.2	5.2	Procedure for hostile boarding response?	Answered	Yes. Covered in WAF SEV SOP under incident management and contingency procedures. <b>Supporting Documentation:</b> SM/OPS/SOP/002 — DD Portal S3

Section 6: Escort Vessels & Equipment				
Item	Ref	Requirements & Expectations	Status	Seagull Response
6.1	6.1	Escort boats NN approved with Pennant Number?	Answered	Yes. All SEVs verified through SM/SEC/PRO/004 approval process. <b>Supporting Documentation:</b> SM/SEC/PRO/004, SEV Register — DD Portal S3
6.2	6.2	Do escort boats fly Nigerian flag?	Answered	Yes. All SEVs are Nigerian-flagged vessels. <b>Supporting Documentation:</b> SEV Register — DD Portal S3
6.3	6.3	Valid Nigerian Certificate of Registry?	Answered	Yes. Verified during SEV approval process. <b>Supporting Documentation:</b> Individual SEV Documentation — DD Portal S9 (example vessel folder)
6.4	6.4	Does PMSC vet escort boats?	Answered	Yes. Comprehensive SM/SEC/PRO/004 approval process including documentation checklist and ongoing monitoring. <b>Supporting Documentation:</b> SM/SEC/PRO/004, SM/SEC/FORM/001 — DD Portal S3
6.5	6.5	Escort boats ballistic approved?	Answered	Yes. Seagull Maritime can provide hardened, ballistically protected vessels. Exact specifications are provided on assignment. Example vessel specifications are available on request. <b>Supporting Documentation:</b> SEV Specifications — DD Portal S9 (on request)
6.6	6.6	Equipment requirements adequate?	Answered	Yes. SM/SEC/PRO/006 establishes the procedure for conducting critical equipment spare parts risk assessments on all SEVs. Example risk assessment provided in DD Portal Section 6. BRAGs (Basic Risk Assessment Guides) provided for key operational activities. <b>Supporting Documentation:</b> SM/SEC/PRO/006, SEV Critical Spares RA (Example) — DD Portal S5, DD Portal S6

Section 7: Insurance & Liability				
Item	Ref	Requirements & Expectations	Status	Seagull Response
7.1	7.1	Insurance cover maintained and valid?	Answered	<p>Yes. Comprehensive insurance maintained including personnel cover and 3rd party liability. Insurance does not prejudice ship-owner's cover. Vessel-specific insurance documentation is provided on request per vessel on assignment. Example documentation packs are also available on request.</p> <p><b>Supporting Documentation:</b> Insurance Certificates — DD Portal S8</p>
7.2	7.2	Public and employer's liability minimum US\$5M?	Answered	<p>Yes. Seagull Maritime maintains standard insurance coverage as per the provided policies, meeting the minimum requirements. Coverage details are documented in the insurance certificates provided.</p> <p><b>Supporting Documentation:</b> Insurance Certificates — DD Portal S8</p>

Section 8: Contractual Terms & Conditions				
Item	Ref	Requirements & Expectations	Status	Seagull Response
8.1	8.1	Jurisdiction for contracts and disputes?	Answered	<p>As per signed agreements with the client, but typically English law and English jurisdiction for maritime contracts.</p> <p><b>Supporting Documentation:</b> Contract Template — Legal/Corporate Files</p>
8.2	8.2	Contract adjusted for escorting only?	Answered	<p>Yes. BIMCO Guardcon contract format used, adjusted for WAF escorting operations.</p> <p><b>Supporting Documentation:</b> Guardcon Contract — DD Portal S5</p>
8.3	8.3	Master detached from RUF/ROE in contract?	Answered	<p>Yes. Guardcon contract explicitly detaches the Master from authority over escort vessel RUF/ROE.</p> <p><b>Supporting Documentation:</b> Guardcon Contract Clause — DD Portal S5</p>
8.4	8.4	P&I approval/evidence?	Answered	<p>Yes. P&amp;I club approvals obtained. Example P&amp;I certificate provided in DD Portal S9 (example vessel folder).</p> <p><b>Supporting Documentation:</b> P&amp;I Certificate — DD Portal S9</p>
8.5	8.5	Service provision without prepayment clause?	Answered	<p>Commercial terms including payment conditions are as per individual client arrangements with Seagull Maritime.</p> <p><b>Supporting Documentation:</b> Contract Terms — Commercial Files</p>
8.6	8.6	No requirement for prepayment in contract?	Answered	<p>Commercial terms including payment conditions are as per individual client arrangements with Seagull Maritime.</p> <p><b>Supporting Documentation:</b> Contract Terms — Commercial Files</p>