



SECURITY ESCORT VESSEL (SEV) APPROVAL PROCEDURE

SEV Approval Procedure



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INTRODUCTION

The use of Security Escort Vessels (SEV) by Seagull Maritime is a critical supply chain element in our West Africa Operations. It is essential that all SEV's in use by Seagull Maritime meet specific minimum documentation requirements. SEV's are required to be approved under this procedure to align with our procedure Supplier Approval - SEV (SM/SEC/PRO/005). SEV's that fail to meet the minimum requirements of this procedure may be subject to withdrawal of use by Seagull Maritime and may impact on the provider's Supplier Approval rating and ongoing use by Seagull Maritime.

This procedure supports Seagull Maritime's commitments under the Voluntary Principles on Security and Human Rights (VPSHR) and the International Code of Conduct for Private Security Service Providers (ICoC) by ensuring all vessels used in operations meet documented safety and compliance standards.

SCOPE

This procedure applies to all SEV's provided for use by Seagull Maritime by suppliers approved under the procedure Supplier Approval - SEV (SM/SEC/PRO/005) and aligns with the requirements of ISO 9001:2015, ISO 28007:2015, and ISO 18788:2015.

EXCLUSIONS

SEV's may only be excluded from this procedure on the approval of the Group Compliance Director. Exclusions will only be granted in extreme cases where there is a critical need. Client approval may also be required before the exclusion can be granted.

PROCEDURE

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Seagull Maritime will conduct an evaluation of all SEV's currently in use or proposed for use to understand the capabilities of the SEV and ensure compliance with industry standards.

The Compliance Manager - WAF will send the supplier SM/SEC/FORM/003 (SEV Vessel Information Form) for completion. On receipt, the Compliance Manager will transfer the returned information into SM/SEC/FORM/001 (SEV Checklist) and, in conjunction with the WAF Operations Director, evaluate the response. Where required, additional information will be requested from the supplier. Where documentation is provided, the documentation will be reviewed against the checklist requirements.

The Compliance Manager - WAF will add the SEV to the SEV Register and upload all provided documentation to:

The named SEV folder in the Shared Drive - West Africa > SEV's
The SEV record in Monday Work Management Platform - SEV Certificates Tracker
Where documents are subject to expiry, the expiry date will be logged and a reminder set for review 1 month before expiry.

The Compliance Manager - WAF will then submit the completed checklist and associated documentation to the Group Compliance Director and WAF Operations Director for review and approval with a rating recommendation based on the information provided and as per this procedure.

Where the Group Compliance Director and WAF Operations Director are satisfied with the completed questionnaire, the documentation provided and the rating recommended, they will update the approval rating in the SEV register accordingly.

Should the Group Compliance Director find any issue with the checklist, the documentation provided, and the rating recommended, they will request the appropriate actions be taken to resolve the issues and review again on completion.

On completion of the review, the SEV Register will be updated as required.

SEV MINIMUM CRITERIA

Vessel minimum specifications

All SEV's deployed by Seagull Maritime must meet the following minimum vessel specifications. Where a requirement is derived from an industry standard, the source is identified.

Requirement	Source	Notes
Speed: 10 knots minimum	Seagull Maritime	OCIMF 1.3 requires speed to be documented. 10kts is Seagull's operational standard.
Length: 20 metres minimum	Seagull Maritime	Operational standard set by Seagull Maritime.
Radar, AIS, GPS navigation systems	BMP-MS	Required for escort coordination and situational awareness.
Marine VHF and secure communications	BMP-MS / OCIMF	OCIMF requires documented

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	6.3.4	comms between SEV and merchant vessel.
Ballistic protection (recommended)	OCIMF 3.1	OCIMF 3.1: vessel hardened or ballistically protected for security duties.
Long endurance capability (5 days offshore minimum)	Seagull Maritime	OCIMF 1.3 requires endurance to be documented. 5 days is Seagull's operational standard.
Fast response capability	BMP-MS	BMP-MS: SEV must be reactive to intercept approaching threats.
Vessel must be formally registered with the Nigerian Navy	OCIMF 2.1 / Shell C4.1	TTW registration and MOU between Coastal State and Company.
Assigned Nigerian Navy armed personnel onboard	OCIMF 4.1 / Shell C6.1	HSSE requirements when Host Nation forces join the vessel.
Must operate under a Naval Escort Agreement	Shell C1.1 / OCIMF 2.1	MOU required, either direct or partnered.
Must be approved by the Naval Headquarters or Western/Eastern Naval Command	OCIMF 2.1 / Shell C4.1	Coastal state approval requirement.
Vessel Emergency Response Plan	OCIMF 1.4	OCIMF 1.4: ERP to cover security related incidents.
Vessel Hardening Plan (VHP) or records of additional protection mounting points	OCIMF 3.2 / Shell C5.2	Documentation of where additional protection is mounted.
SOPs reflecting additional HSSE requirements when armed personnel embark	OCIMF 4.1-4.2 / Shell C6.1-6.2	Vessel SOPs must address safety equipment and PPE for security operations.

Minimum crew requirements

All SEV's must carry as a minimum the following crew and maintain the associated documentation.

Requirement	Source	Notes
Certified Captain (STCW compliant)	OCIMF 4.3 / Shell C6.3	Crew training records must reflect seafaring competency.
Marine engineers	Seagull Maritime	Operational necessity for vessel maintenance and endurance.
Deck crew	Seagull Maritime	Minimum crew for safe vessel operation.
Nigerian Navy armed personnel (escort team)	OCIMF 2.1 / Shell C1.1	TTW armed operations requirement under Naval Escort Agreement.
Valid STCW certification for all crew	OCIMF 4.3 / Shell C6.3	Training and seafaring competency documentation required.
Seafarer medical fitness certificates	Seagull Maritime	Good practice, implied by STCW compliance requirements.

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Security training and refresher training records	OCIMF 4.4 / Shell C6.4	Records must show frequency of security training.
Safety equipment and PPE records	OCIMF 4.2 / Shell C6.2	Overalls, hard hats, ear and eye protection documented.

SHELL TASKINGS

Seagull Maritime is currently progressing through Shell’s Global Maritime Security Assessment (GMSA) programme to become an approved Private Maritime Security Company (PMSC) under that scheme. Shell’s vetting process is one of the most rigorous in the maritime security industry, and Seagull Maritime aligns its SEV standards with these requirements in preparation for — and ahead of — Shell-appointed taskings.

In addition to Seagull Maritime’s commitment to the Voluntary Principles on Security and Human Rights (VPSHR) and the International Code of Conduct for Private Security Service Providers (ICoC), the following additional requirements apply to any SEV deployed on a Shell tasking. These requirements are drawn from Shell’s PMSC Vetting Questionnaire (Section C) and supplement the minimum criteria defined above.

Where a requirement below conflicts with or exceeds the general minimum criteria, the Shell requirement takes precedence for Shell-appointed taskings.

Additional vessel requirements

Requirement	Shell Reference
Ballistic protection is mandatory (not recommended)	Shell C5.1
Vessel Hardening Plan (VHP) or documented records of where additional protection is mounted	Shell C5.2
Operating licences for all security-related equipment (weapon mounts, ballistic helmets, body armour, night vision equipment)	Shell C5.3
Class approval documentation for any security enhancements where required	Shell C5.4
Documented anti-piracy briefing presentation for charterer, owner, Master and crew covering roles and responsibilities during security incidents	Shell C8.2
Service Level Agreement (SLA) between Seagull Maritime and the SEV provider	Shell C8.3
Nigerian incorporation documentation: CAC certificate of registration, shareholder names and certificates	Shell C8.4
NIMASA RSO registration licence to operate in the Nigerian maritime sector	Shell C8.4
DPR (Department of Petroleum Resources) certificate	Shell C8.4
Details of partnerships, joint ventures and SLAs with third parties including a brief description of each arrangement	Shell C8.4
List and description of Nigerian bases including offices and waterfront facilities where vessels are moored, maintained, fuelled and where crew changes take place	Shell C8.4
NJZ diplomatic clearance from the Nigerian Navy if operating in the Nigerian Joint Development Zone	Shell C8.1

Shell Documentation Requirements

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In addition to the standard documentation requirements above, the following documents are required for Shell-approved WAF taskings. These are driven primarily by Shell Section C8.4 (Nigerian incorporation and operational documentation) and Shell-specific operational requirements.

Document	Description / Notes	Shell Reference
Nigerian Certificate Incorporation	Corporate Affairs Commission (CAC) certificate of registration, names of shareholders, and shareholder certificate	Shell C8.4
NSCDC Licence	Civil Defence Corp licence for security services in Nigeria	Shell C8.4
NIMASA RSO Registration	Nigerian Maritime Administration and Safety Agency recognised security organisation licence	Shell C8.4
DPR Certificate	Department of Petroleum Resources certificate to operate	Shell C8.4
NIPEX Membership	Nigerian Petroleum Exchange proof of membership	Shell C8.4
Nigerian Vessel Registration	NIMASA flag state registration for each SEV	Shell C8.4
Partnership / JV / SLA Details	Details of all partnerships, joint ventures, and current SLAs with third parties, including brief description of each arrangement	Shell C8.4
List of Nigerian Bases	Offices and waterfront bases where vessels are moored, maintained, fuelled, and crew changes take place	Shell C8.4
Fleet Inventory	All vessels, specifying whether owned, chartered, or part-owned	Shell C8.4
Record of Escort Experience	Total escort duties completed and average per month	Shell C8.4
Anti-Piracy Presentation Briefing	Documented presentation for charterer, owner, master, and crew detailing anti-piracy measures for SEV deployment	Shell C8.2
SEV Provider SLA	Service Level Agreement between Seagull Maritime and SEV provider	Shell C8.3

RATING CRITERIA

A: Known and or previously used SEV with no history of poor performance

The SEV has all documentation to meet minimum requirements as well as additional documentation known to meet priority clients' requirements. The basis of good compliance will consider if the vessel has no active or recent Supplier Corrective Action Reports and maintains and holds all relevant certifications required by this procedure. The SEV will also be owned/managed by a SEV provider with a supplier approval rating of B or above.

B: Satisfactory SEV, no known issues with performance

The SEV documentation meets minimum requirements. Some documentation deemed non-critical may be expired but the provider has demonstrated renewal is in progress.

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C: Unsatisfactory SEV with known performance issues, poor service and/or compliance

SEV documentation does not meet minimum requirements and/or an excess of additional documentation is expired and not renewed.

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APPROVED SEV'S

Pending - SEV has been added to the Register, the SEV checklist has been completed and minimum documentation has been received and is under review.

Approved (Temp) - Further information is required but approval granted to use in the interim period.

Approved - Has been approved following evaluation and Basis for Current Approval is provided.

Under Review - A non-conformity, issue, complaint or incident has occurred that has impacted on service delivery and the SEV is being reviewed for performance via a Supplier Corrective Action Report (SCAR). SEV documents may be outdated or missing.

Withdrawn - Following completion of a SCAR or result of poor performance or any other issue, decision has been made to withdraw approval. (Important Note: A SEV can have approval withdrawn but remain available temporarily for use due to critical operational capability until a replacement is arranged and approved. This should be managed in line with our risk policy). The use of a SEV with "Withdrawn" status must be approved by either the WAF Operations Director, the Group Compliance Director or the CEO.

BASIS OF CURRENT APPROVAL

Evaluated - Due diligence completed - no issues

Existing SEV - Pending - Known to the company and is currently supplying with no issues, evaluation incomplete

Critical SEV - DD Pending - Company relies on the SEV and/or it's provider due to operational demand, evaluation incomplete. This can also be applied to SEV's who have "withdrawn" status.

SCAR in progress - When a SEV is under review.

Poor Service/Quality - Reason for withdrawal, can be expanded upon in any SCAR or NCR reported related to the supplier.

Missing Documents - SEV fails to meet the minimum documentation requirements.

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WITHDRAWAL OF APPROVAL

SEV performance is continually reviewed and is also considered during management review. Reasons for potential withdrawal can include, but not be limited to:

- Receipt of a client complaint regarding the performance of the SEV on task
- The generation of Supplier Corrective Action Reports (managed in accordance with SM/INT/PRO/001) where the SEV is deemed to have failed to address the issues therein and failed to implement (in the opinion of Seagull Maritime) the appropriate corrective actions.
- General performance and service does not meet the requirements of Seagull Maritime.
- A decision by management to withdraw approval for the SEV provider.
- Failure to provide, maintain or update the minimum documentation requirements.

Withdrawn SEV's – SEV's on a "C" rating may also be subject to permanent removal from the SEV Register should a new SEV be approved and receive a rating of "B" or higher. Providers may resubmit a removed SEV for re-approval as per this procedure at any time however previous withdrawal of approval should be reflected in any new approval/rating given.

Individual Client Withdrawal of Approval – Individual SEV's may have approval withdrawn for an individual specific Seagull Maritime client on basis of previous poor performance or failure to meet the specific client's additional compliance requirements.

PRIORITY OF USE

SEV's will be prioritised for use by Seagull Maritime based on their Approval Rating and their SEV documentation. For example, should a SEV be downgraded to rating "C" then they would only be considered for use under extreme circumstances. Priority will also be given to those suppliers who are able to meet the additional requirements of specific Seagull Maritime clients.

AUDITING

Seagull Maritime will, annually or where deemed necessary due to a failure in performance or concerns over the quality of a SEV conduct an audit of the vessel in question. This audit will be conducted by Compliance Manager – WAF and must be conducted on board the vessel in question.

SEV CHECKLIST

All SEV's must have a completed SEV Checklist (SM/SEC/FORM/001) on file to hold a pending or completed approval rating. The source data is collected via SM/SEC/FORM/003 (SEV Vessel Information Form) which is completed by the SEV provider and returned to Seagull Maritime. The Seagull assessor transfers the information into the SEV Checklist which records: SEV Owners Information, Contact Details, Date of last Seagull Maritime Audit, Documentation checklist.

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DOCUMENTATION

Minimum Documentation Requirements

In line with OCIMF guidance, BMP-MS, and applicable flag state requirements, the following documentation is compulsory for SEV approval. Source attributions identify the originating standard for each requirement.

Document	Description / Notes	Source
Technical Specification	Must demonstrate vessel is suitable for security tasks, including maximum speed and endurance	OCIMF 1.1-1.3 / Shell C3.2-C3.3
Certificate of Ownership	Proof of vessel ownership or charter agreement	OCIMF 2.1
Class Certificate	Current classification society certificate	OCIMF App C
Flag State Approval	Approval for embarkation of security personnel on board	OCIMF 2.2
Letter of Authority from Flag State	Flag state authority to conduct security operations	OCIMF 2.3
TTW Registration / MOU	If operating in territorial waters: registration, approval for security use, and MOU between coastal state and company	OCIMF 2.1 / Shell C4.1
Vessel Hardening Plan	Documentation of ballistic protection and where additional protection is mounted	OCIMF 3.2 / Shell C5.2
Security Equipment Licences	Operating licences for security-related equipment (weapon mounts, body armour, NVGs, ballistic helmets)	OCIMF 3.3
Class Approval of Enhancements	If applicable: documentation that security enhancements (e.g. fixed weapon mounts) are approved by Class	OCIMF 3.4 / Shell C5.4
Vessel Emergency Response Plan	Covering security-related incidents	OCIMF 1.4
SOPs for Armed Personnel	Standard operating procedures reflecting additional HSSE requirements when HNF or PCASP join the vessel	OCIMF 4.1 / Shell C6.1
Safety Equipment and PPE Records	Records listing safety equipment and PPE (overalls, hard hats, ear and eye protection) used	OCIMF 4.2 / Shell C6.2
Crew Training Records	Must document seafaring competency and how often security training / refresher training occurs	OCIMF 4.3-4.4 / Shell C6.3-C6.4
Maintenance and Servicing Records	Documented maintenance schedules and evidence vessel is maintained to operating specification	OCIMF 1.5-1.6 / Shell C3.4-C3.6
Evidence of Recent Sea Trial	Demonstrating current operational readiness	Seagull
Recent Dated Photographs	Within the last 12 months	Seagull
Masters Feedback Report	From the last 3 months of operations	Seagull
OVID/CMID Inspection Report	Most recent inspection report if available	Industry
Critical Equipment Spares RA	Risk assessment for critical equipment spares availability	Seagull

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International Certificate	Tonnage	Current certificate	SOLAS / Flag State
Safety Certificate	Construction	Current certificate	SOLAS / Flag State
Safety Equipment Certificate		Current certificate	SOLAS / Flag State
Safety Radio Certificate		Current certificate	SOLAS / Flag State / OCIMF App C
Minimum Safe Manning Certificate		Current MSMC	SOLAS / OCIMF App C
ISM Code Compliance (SMC)		Current Safety Management Certificate	ISM Code
Hull & Machinery Insurance		Current H&M insurance certificate	OCIMF App C
Protection & Indemnity (P&I) Insurance		Current P&I club certificate	OCIMF App C

Where an SEV is deployed on a Shell-approved tasking, additional documentation requirements apply as detailed in the Shell Taskings section of this procedure.

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DOCUMENT STORAGE

All SEV approval documentation is stored in the Seagull Maritime West Africa shared drive: "Seagull Maritime West Africa — Approved SEV Suppliers and Vessels". This drive is the single source of truth for all SEV-related documentation. Documents must not be stored locally, in personal drives, or in email attachments.

Shared Drive Structure

The shared drive is organised into the following top-level structure. No files are to be stored at the root level other than the SEV Register and SEV Certificate Tracking spreadsheet.

Seagull Maritime West Africa — Approved SEV Suppliers and Vessels	
Shared Drive — Top Level Structure	
Access: WAF Operations Director, Compliance Manager — WAF, Group Compliance Director	
Name	Description
<input type="checkbox"/> SEV Providers	One subfolder per approved provider
<input type="checkbox"/> SEV's	One subfolder per vessel (by vessel name)
<input type="checkbox"/> Client DD	Client-specific task packs and crew docs
<input type="checkbox"/> SEV Register	Master register of all SEVs and approval status
<input type="checkbox"/> SEV Certificate Tracking	Expiry dates and renewal tracking

Figure 1 — Shared Drive top-level structure

File Naming Convention

All documents must follow a standardised naming convention to ensure consistency and enable rapid identification of missing documentation. Files that do not follow this convention will be rejected during audit and the provider or vessel status may be affected.

Provider-level documents use the prefix "P" followed by a two-digit sequence number: P01, P02, P03, etc. Vessel-level documents use the prefix "V" followed by a two-digit sequence number: V01, V02, V03, etc. The sequence numbers correspond directly to the items in the SEV Checklist (SM/SEC/FORM/001).

The naming format is:

- Provider documents: P[nn] - [Document Name].[ext]
- Vessel documents: V[nn] - [Document Name].[ext]
-

For example: "V01 - Technical Specification.pdf" or "P03 - NIMASA RSO Registration.pdf". Where a document has been updated or renewed, the previous version should be moved to an "Archive" subfolder within the same directory, not deleted.

Provider Documentation Folder

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Each approved SEV provider has a dedicated folder under "SEV Providers". Provider-level documentation covers corporate registration, licences, and operational capability. The following example illustrates the expected folder contents and naming convention:

SEV Providers > Allland Offshore			
Provider Documents — Allland Offshore			
File naming: P[nn] - [Document Name].[ext]			
Name		Date modified	Size
<input type="checkbox"/> P01 - CAC Certificate of Registration.pdf	Shell	Apr 4, 2026	2.1 MB
<input type="checkbox"/> P02 - NSCDC Licence.pdf	Shell	Apr 4, 2026	115 KB
<input type="checkbox"/> P03 - NIMASA RSO Registration.pdf	Shell	Apr 4, 2026	950 KB
<input type="checkbox"/> P04 - DPR Certificate.pdf	Shell	Apr 4, 2026	440 KB
<input type="checkbox"/> P05 - NIPEX Membership.pdf	Shell	Apr 4, 2026	438 KB
<input type="checkbox"/> P06 - Partnership and SLA Details.pdf	Shell	Apr 4, 2026	312 KB
<input type="checkbox"/> P07 - List of Nigerian Bases.pdf	Shell	Apr 4, 2026	156 KB
<input type="checkbox"/> P08 - Fleet Inventory.pdf	Shell	Apr 4, 2026	89 KB
<input type="checkbox"/> P09 - Record of Escort Experience.pdf	Shell	Apr 4, 2026	72 KB
<input type="checkbox"/> P10 - SEV Provider SLA.pdf	Mandatory	Apr 4, 2026	346 KB
<input type="checkbox"/> P11 - VAT Registration Certificate.pdf		Apr 4, 2026	61 KB

Figure 2 — Example provider documentation folder (Allland Offshore)

Vessel Documentation Folder

Each SEV has a dedicated folder under "SEV's", named using the vessel name in capitals (e.g. "MV MEDIATOR II"). Vessel-level documentation covers statutory certificates, operational readiness, and compliance with OCIMF and BMP-MS requirements as defined in the Minimum Documentation Requirements section of this procedure. The following example illustrates the expected folder contents:

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SEV's > MV MEDIATOR II

Vessel Documents — MV MEDIATOR II
File naming: V[nn] - [Document Name].[ext]

Name	Date modified	Size
<input type="checkbox"/> V01 - Technical Specification.pdf Mandatory	Apr 4, 2026	1.2 MB
<input type="checkbox"/> V02 - Photographs (Apr 2026).pdf Seagull	Apr 4, 2026	4.8 MB
<input type="checkbox"/> V03 - Certificate of Ownership.pdf Mandatory	Apr 4, 2026	486 KB
<input type="checkbox"/> V04 - Class Certificate.pdf Mandatory	Apr 4, 2026	267 KB
<input type="checkbox"/> V05 - Flag State Approval.pdf Mandatory	Apr 4, 2026	181 KB
<input type="checkbox"/> V06 - Letter of Authority.pdf Mandatory	Apr 4, 2026	195 KB
<input type="checkbox"/> V07 - TTW Registration and MOU.pdf Mandatory	Apr 4, 2026	17.1 MB
<input type="checkbox"/> V08 - Vessel Hardening Plan.pdf Mandatory	Apr 4, 2026	312 KB
<input type="checkbox"/> V09 - Security Equipment Licences.pdf Mandatory	Apr 4, 2026	156 KB
<input type="checkbox"/> V10 - Vessel ERP.pdf Mandatory	Apr 4, 2026	520 KB
<input type="checkbox"/> V11 - SOPs for Armed Personnel.pdf Mandatory	Apr 4, 2026	1.8 MB
<input type="checkbox"/> V12 - Safety Equipment and PPE Records.pdf Mandatory	Apr 4, 2026	340 KB
<input type="checkbox"/> V13 - Crew Training Records.pdf Mandatory	Apr 4, 2026	2.1 MB
<input type="checkbox"/> V14 - Maintenance and Servicing Records.pdf Mandatory	Apr 4, 2026	749 KB
<input type="checkbox"/> V15 - Sea Trial Evidence.pdf Seagull	Apr 4, 2026	1.5 MB
<input type="checkbox"/> V16 - NIMASA Registration.pdf Mandatory	Apr 4, 2026	950 KB
<input type="checkbox"/> V17 - International Tonnage Certificate.pdf	Apr 4, 2026	181 KB
<input type="checkbox"/> V18 - Safety Construction Certificate.pdf	Apr 4, 2026	267 KB
<input type="checkbox"/> V19 - Safety Equipment Certificate.pdf	Apr 4, 2026	234 KB
<input type="checkbox"/> V20 - Safety Radio Certificate.pdf	Apr 4, 2026	198 KB
<input type="checkbox"/> V21 - Minimum Safe Manning Certificate.pdf	Apr 4, 2026	145 KB
<input type="checkbox"/> V22 - ISM Code SMC.pdf	Apr 4, 2026	312 KB
<input type="checkbox"/> V23 - H&M Insurance Certificate.pdf Mandatory	Apr 4, 2026	520 KB
<input type="checkbox"/> V24 - P&I Insurance Certificate.pdf Mandatory	Apr 4, 2026	486 KB
<input type="checkbox"/> V25 - OVID CMID Report.pdf Seagull	Apr 4, 2026	1.8 MB
<input type="checkbox"/> V26 - Critical Equipment Spares RA.pdf Seagull	Apr 4, 2026	156 KB
<input type="checkbox"/> V27 - Masters Feedback Report.pdf Seagull	Apr 4, 2026	89 KB

Figure 3 — Example vessel documentation folder (MV MEDIATOR II)

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Responsibilities

- WAF Operations Director: Responsible for ensuring all SEV providers and vessels maintain current documentation in the shared drive in accordance with this naming convention.
- Compliance Manager — WAF: Responsible for periodic audit of folder contents against the SEV Checklist (SM/SEC/FORM/001) and reporting gaps to the WAF Operations Director and Group Compliance Director.
- Group Compliance Director: Overall accountability for the integrity of the SEV documentation system and alignment with the requirements of this procedure.

OPERATIONAL EXCEPTIONS

Seagull Maritime reserves the right, where an SEV has been approved by the client for a specific tasking, to deploy that SEV prior to full compliance with all requirements of this procedure.

This exception does not apply to Shell-appointed taskings or any other client engagement where the client maintains additional documented SEV standards beyond those set out in this procedure. In such cases, the SEV must meet both the requirements of this procedure and the client's additional standards before deployment.

Where this exception is applied, the following conditions must be met:

- The WAF Operations Director or Group Compliance Director must authorise the deployment.
- The SEV must be recorded in the SEV Register with a rating no higher than "Approved (Temp)" and the basis of current approval must reference the client approval and the specific tasking.
- A Supplier Corrective Action Report (SCAR) must be raised to track the outstanding documentation or requirements to full compliance, managed in accordance with SM/INT/PRO/001.
- The exception must be recorded in the SEV Checklist (SM/SEC/FORM/001) against the relevant items.
- The exception must be recorded in the SEV Vessel Information Form (SM/SEC/FORM/003) against the relevant items.

This exception is not a substitute for full compliance. Repeated use of this exception for the same SEV or SEV provider will be considered during management review and may result in downgrade of the approval rating or withdrawal of approval in accordance with this procedure.

TRANSITIONAL COMPLIANCE

This procedure has been updated to reflect current OCIMF guidance, BMP-MS requirements, and Shell PMSC vetting standards. All existing SEV providers and vessels currently listed on the SEV Register are required to meet the full requirements of this procedure within three (3) months of the effective date.

During the transitional period, existing SEV providers may continue to operate under their current approval status. The WAF Operations Director is responsible for communicating the updated requirements to all providers and ensuring a compliance plan is in place for each vessel within 30 days of the effective date.

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Any SEV provider that has not met the requirements of this procedure by the end of the transitional period will have their approval status reviewed. Failure to comply will result in downgrade to "Under Review" or withdrawal of approval in accordance with the Withdrawal of Approval section of this procedure.

The transitional period does not apply to new SEV providers or vessels added to the SEV Register after the effective date of this procedure. New providers must meet all requirements before approval is granted.

RELATED DOCUMENTS

SM/SEC/PRO/005 Supplier Approval (SEV)
SM/INT/PRO/001 NCR/OFI/CAPA Management
SM/INT/REG/004 NCR Register
SM/HSE/POL/001 OH&S Policy
SM/SEC/POL/001 Security Management Policy
SM/INT/POL/007 Risk Management Policy