



**SUPPLIER APPROVAL  
PROCEDURE — SECURITY  
ESCORT VESSEL PROVIDERS**

# Supplier Approval Procedure

## — SEV Providers



<b>Document Title</b>	Supplier Approval Procedure — Security Escort Vessel Providers
<b>Document Ref</b>	SM/SEC/PRO/005
<b>ISO Standard</b>	ISO 9001:2015 / ISO 45001:2018 / ISO 28007:2015 / ISO 18788:2015
<b>ISO Clauses</b>	9001: 8.4.1 / 45001: 6.1.4 / 28007: 4.4.1 / 18788: A.4.3.1
<b>Version</b>	1.2
<b>Classification</b>	Internal
<b>Effective Date</b>	04 May 2026
<b>Review Date</b>	Annual, or upon significant change to supplier base
<b>Approved By</b>	Darren Watts, Group Compliance Director Pavel Shparber, CEO
<b>Supersedes</b>	v1.1 (April 2026); v1.0 (April 2026). v1.2 reissue: paragraphs 23 and 89 corrected — Anti-Bribery, Corruption and Sanctions reference split into POL/001 (Anti-Bribery, Corruption and Business Ethics) and POL/012 (Sanctions Policy) following S42 standalone Sanctions Policy issuance.

## INTRODUCTION

Seagull Maritime operates with Security Escort Vessel (SEV) suppliers that are essential to the delivery of our West Africa operations. It is essential that all SEV suppliers in use by Seagull Maritime are subject to comprehensive due diligence and supplier approval processes. This procedure establishes the requirements for supplier evaluation, approval, monitoring, and withdrawal of approval for all SEV provider companies.

This procedure supports Seagull Maritime’s commitment to responsible supply chain management under the Voluntary Principles on Security and Human Rights (VPSHR) and the International Code of Conduct for Private Security Service Providers (ICoC).

## SCOPE

This procedure applies to all SEV providers and suppliers providing SEV’s provided for use by Seagull Maritime. This procedure aligns with the supplier evaluation requirements of ISO 9001:2015 Clause 8.4 and ISO 18788:2015.

## EXCLUSIONS

This procedure applies exclusively to SEV providers. All other suppliers of goods and services to Seagull Maritime are evaluated under the Supplier Approval — General procedure.

# Supplier Approval Procedure

## — SEV Providers



### MINIMUM PROVIDER DOCUMENTATION

All SEV providers must supply the following corporate and operational documentation as part of the due diligence and approval process. These requirements are derived from OCIMF, Shell PMSC Vetting, and ISO 18788.

Document (File Reference)	Description / Notes	Source
P01 — Nigerian Incorporation Certificate (CAC)	Valid company registration in Nigeria	Shell C8.4
P02 — NSCDC Licence	Nigeria Civil Defence Corps security licence	Shell C8.4
P03 — NIMASA RSO Registration	Recognised Security Organisation registration	Shell C8.4
P04 — DPR Certificate	Department of Petroleum Resources clearance	Shell C8.4
P05 — NIPEX Membership	Nigerian Petroleum Exchange joint qualification	Shell C8.4
P06 — Partnership / JV / SLA Details	Sub-contracting and partnership arrangements	Shell C8.4
P07 — List of Nigerian Bases	Operational base locations and capacity	Shell C8.4
P08 — Fleet Inventory	All vessels available for escort operations	Shell C8.4
P09 — Record of Escort Experience	Documented escort operations history	Shell C8.4
P10 — Anti-Piracy Briefing Presentation	Standard client/crew briefing material	Shell C8.2
P11 — SEV Provider SLA	Service level agreement with Seagull Maritime	Shell C8.3

File references P01-P11 correspond directly to the file naming convention in SM/SEC/FORM/001 (SEV Checklist) and the Provider Documentation sheet. All documents must be saved to the shared drive using the P-prefix naming convention as defined in SM/SEC/PRO/004.

### DUE DILIGENCE QUESTIONNAIRE

All SEV providers must complete SM/SEC/FORM/004 (SEV Provider Due Diligence Form). The Seagull assessor transfers the returned information into SM/SEC/FORM/002 (WAF Escorting Due Diligence Checklist) for internal scoring and assessment. The questionnaire is structured across eight assessment sections aligned to international standards and client requirements:

FORM-002 Section	Scope	Standard Reference
Section 1 — General & Certifications	Company registration, insurance, policies, sanctions screening	OCIMF 2.1-2.4 / Shell C8.4 / ISO 18788 A.4.3.1
Section 2 — Knowledge & Experience	WAF operational track record, personnel qualifications	OCIMF 4.3-4.4 / Shell C6.3
Section 3 — Procedures	Incident reporting, RoE, emergency response, maintenance	OCIMF 4.1 / Shell C6.1 / ISO 18788 A.9.8
Section 4 — Employee	Background checks, vetting, employment	ISO 18788 A.4.3.2 /

# Supplier Approval Procedure

## — SEV Providers



Screening	verification	ICoCA Art. 48-49
Section 5 — Training	Security, firearms, human rights training records	OCIMF 4.3 / ISO 18788 A.4.5 / VPSHR
Section 6 — Escort Boats	Vessel registration, insurance, equipment, maintenance	OCIMF 1.1-1.6 / Shell C3.2-C3.6
Section 7 — Insurance	Professional indemnity, K&R, vessel damage coverage	OCIMF App C / Shell C7
Section 8 — Contractual	Contract terms, audit rights, operational reporting	ISO 18788 A.4.3.1 / Shell C8.3

Providers must achieve a minimum compliance score across all sections to be eligible for approval. Sections with non-compliant responses will generate findings managed through SM/INT/PRO/001 (NCR/OFI/CAPA Management). The questionnaire includes supplier acknowledgement of Seagull Maritime's Anti-Bribery, Corruption and Business Ethics Policy (SM/INT/POL/001), Sanctions Policy (SM/INT/POL/012), Code of Conduct (SM/INT/POL/002), and commitment to the VPSHR and ICoCA principles.

## SUPPLIER IDENTIFICATION AND DUE DILIGENCE

All prospective SEV suppliers must undergo due diligence evaluation prior to being approved for use. The due diligence process is managed in accordance with SM/SEC/PRO/002 Due Diligence and Client Vetting Procedure. Suppliers must also pass a sanctions screening check against applicable sanctions lists (UK, EU, US OFAC) before approval can be granted.

## SUPPLIER ACKNOWLEDGEMENTS

Approved SEV suppliers must:

- Acknowledge that their approval is conditional on maintenance of the standards and requirements set out in this procedure and in SM/SEC/PRO/004 SEV Approval Procedure (SM/SEC/PRO/004)
- Maintain all relevant insurance and certifications for vessels supplied under this arrangement
- Notify Seagull Maritime immediately of any significant changes to the supplier, their ownership, management, or fleet composition
- Co-operate with any audits, inspections, or monitoring activities conducted by Seagull Maritime
- Remediate any non-conformances or findings raised by Seagull Maritime within the agreed timeframe

## SUPPLIER MONITORING

Supplier performance is monitored continuously throughout the year via:

- Operational feedback from Masters and crew on SEV performance, conduct, and professionalism
- Client feedback reports and complaints
- Incident and accident reporting data
- Audit findings and compliance assessment results
- Financial stability and operational continuity assessment

## SUPPLIER CORRECTIVE ACTIONS

# Supplier Approval Procedure

## — SEV Providers



Where performance issues are identified, a Supplier Corrective Action Report (SCAR) will be issued (managed in accordance with SM/INT/PRO/001). The supplier will be required to investigate the issue, develop a corrective action plan, and provide evidence of implementation within the agreed timeframe.

Failure to address SCAR findings adequately may result in a downgrade of supplier approval rating or suspension pending resolution.

## APPROVAL RATING SYSTEM

### A: Approved Supplier

Supplier has passed full due diligence, has no known performance issues, maintains all required certifications and insurance, and has a demonstrable track record of quality service delivery. Approval is granted for the full range of operations and vessel types offered by the supplier.

### B: Approved - Conditional

Supplier has passed due diligence but approval is granted subject to conditions or restrictions, such as specific vessel limitations, regional restrictions, or other operating parameters. Approval will be reviewed within a defined timeframe to assess whether conditions have been satisfied and upgrade to full approval.

### C: Not Approved

Supplier has failed due diligence assessment, has unresolved compliance issues, or cannot meet the requirements of this procedure. Suppliers will be required to remediate identified issues and may re-apply for approval after a minimum of 3 months.

## BASIS OF CURRENT APPROVAL

All approval decisions require a documented basis recorded in the Supplier Register. The following classifications apply:

Status	Description	Notes
Evaluated	Due diligence completed with no outstanding issues	Standard approval pathway
Previous Supplier — DD Pending	Known to the company, previously supplied with no issues	Evaluation incomplete
Existing Supplier — DD Pending	Currently supplying with no issues	Evaluation incomplete
Critical Supplier — DD Pending	Company relies on the product or service	Also applies to withdrawn suppliers
Client Approved (Temp)	Client has approved for specific tasking	SCAR raised for outstanding items
SCAR in Progress	Supplier under review following corrective action	Rating may change on resolution

# Supplier Approval Procedure

## — SEV Providers



Poor Service / Quality	Performance does not meet requirements	Reason for withdrawal
Missing Documents	SEV documentation fails minimum requirements	Per SM/SEC/PRO/004

### PRIORITY OF USE

Suppliers will be prioritised for use by Seagull Maritime based on their Approval Rating, SEV documentation status (per SM/SEC/PRO/004), and the specific requirements of the tasking client.

Suppliers with a “C” rating will only be considered under extreme circumstances and are subject to removal from the Approved Supplier List should a replacement supplier be approved at “B” or higher.

Priority will also be given to suppliers who hold ISO 9001:2015 and/or ISO 18788:2015 certification, and to those who are able to meet the additional requirements of specific Seagull Maritime clients (e.g. Shell PMSC Vetting requirements).

### WITHDRAWAL OF APPROVAL

Supplier approval may be withdrawn at any time for reasons including, but not limited to:

- Failure to meet quality, safety, or operational standards
- Significant changes in ownership, management, or structure without prior disclosure or approval
- Failure to maintain required insurance and certifications
- Repeated non-conformance with corrective action requests
- Sanctions list involvement or reputational risk to Seagull Maritime
- Non-compliance with VPSHR or ICoC principles and standards
- Withdrawn suppliers may reapply for approval following remediation of identified issues and a minimum 6-month period, subject to re-assessment of due diligence.

### REVIEW AND RE-EVALUATION

All approved suppliers must be re-evaluated on an annual basis, or earlier where any of the following occur:

- A significant non-conformance is raised that generates a Supplier Corrective Action Report
- The supplier fails to maintain the minimum documentation requirements specified in SM/SEC/PRO/004
- The supplier fails to agree to, or complete, any audits requested by Seagull Maritime
- A change in the supplier’s ownership, management, fleet composition, or operational capability
- A change in regulatory or client requirements that affects the supplier’s eligibility

Annual re-evaluation will be conducted by the Compliance Manager — WAF and reviewed by the Group Compliance Director. Re-evaluation uses the same SM/SEC/FORM/004 (provider form) and SM/SEC/FORM/002 (internal checklist) questionnaire process, and SM/SEC/FORM/003 (vessel form) and SM/SEC/FORM/001 (vessel checklist) process as the initial evaluation.

### DOCUMENT STORAGE

# Supplier Approval Procedure

## — SEV Providers



All supplier documentation, completed questionnaires, and approval records must be stored on the shared drive:

Seagull Maritime West Africa — Approved SEV Suppliers and Vessels

Provider-level documents (P01-P11) are stored in the provider's named subfolder under SEV Providers. Vessel-level documents (V01-V27) are stored under the vessel's named subfolder under SEV's. The full folder structure and file naming conventions are defined in SM/SEC/PRO/004 (SEV Approval Procedure), Section: Document Storage.

### RELATED DOCUMENTS

- SM/SEC/PRO/004 — SEV Approval Procedure
- SM/SEC/PRO/002 — Due Diligence and Client Vetting Procedure
- SM/SEC/FORM/001 — SEV Checklist (vessel and provider documentation)
- SM/SEC/FORM/002 — WAF Escorting Due Diligence Checklist
- SM/SEC/FORM/003 — SEV Vessel Information Form
- SM/SEC/FORM/004 — SEV Provider Due Diligence Form
- SM/INT/PRO/001 — NCR/OFI/CAPA Management
- SM/INT/REG/004 — NCR/OFI/CAPA Register
- SM/INT/POL/002 — Code of Conduct
- SM/INT/POL/001 — Anti-Bribery, Corruption and Business Ethics Policy
- SM/INT/POL/012 — Sanctions Policy
- SM/OPS/SOP/002 — WAF SEV Operations
- SM/HSE/PRO/002 — Legal and Regulatory Compliance Procedure