

THE COMPANY IS TOTALLY COMMITTED TO THE FOLLOWING:***A. OUR MISSION IS TO***

Implement the Management System on both the Company and the vessels efficiently and effectively and achieve the ZERO INCIDENT and ZERO SPILL at sea target, through a high performance level and flawless operation in complying with all requirements set by existing Codes – Conventions – Rules and Regulations.

B. OUR VISION IS TO

Achieve our Customers and National – International Organizations involved recognition and respect being within the best Companies in the Marine Industry.

OBJECTIVES – POLICIES**2.1 OBJECTIVES**

Our Objectives are :

- *To transport oil and oil products as well as other liquid cargoes in bulk **safely, environment friendly and efficiently** with respect to our employees and the community*
- *To enhance company's **reliability** in offering these service*
- *To safeguard company's **concistency and optimisation** in performance quality and performance reliability, whereby people, equipment, material and environment interface in a way that their **maximum potential** is realised*
- *To create **additional values** such as:*
 - *International community image*
 - *Job pride amongst employees*
 - *Well trained workforce*
 - *Direct/indirect contribution to the community*

2.2 POLICIES

2.2.1 GENERAL POLICY

The Rule

- *Dynamic planning, acting, evaluating, revising*
- *Proactive day to day management*
- *Continuous upgrading in Safety, Quality, occupational health and environmental protection*
- *Support by proper documentation confirms Company's commitment to excellence and safeguards Company's consistency of performance*

Better Safe than sorry!

- *Our vessels are designed and equipped with first class equipment and are operated and maintained to the highest standard, exceeding the standards set by the Industry (Classification Societies, IMO, ILO, USCG, ISGOTT, OCIMF as well as Local and International recommended Rules and Regulations, Codes, Standards and Guidelines)*

Only happy people can be efficient!

- *Our vessels accommodation and our ashore premises are the proper Environment for our employees to operate efficiently with pleasure and safety*
- *Our employees on board and ashore, are motivated and are trained to be committed to Company's Objectives and Policies*
- *Our supplies are procured timely, of the proper quality, in the necessary quantity*

Companies are as good as the people running them!

- *Our employees, on board and ashore are suitably educated and qualified to perform safely, environment friendly and efficiently*
- *Our employees, on board and ashore, are trained to catch up with the changing standards of the Industry*
- *Continuous motivation, through day to day management, and repeated training are provided to ensure our employees, on board and ashore, are committed and competent in performing their duty safely, efficiently and environment friendly*

Environment upgrading is the key to our survival!

- *Environment preservation and Environment friendly operations is the cornerstone for humanity survival*
- *Our Company is committed to satisfy the current and anticipated needs to enhance environmental protection and upgrading aiming at a ZERO SPILL TARGET*

Documents speak louder than words!

- *Proper documentation is developed to support our Objectives and Policy, embracing all Company's operations and procedures*
- *Reporting, evaluation and revision procedures are established, Facilitating Safety Quality management implementation*

2.2.2 HEALTH AND SAFETY PROTECTION POLICY

Objectives

- To protect all personnel from avoidable injury and hardship.
- To undertake all duties safely and pollution free.
- To demonstrate through the Company's safety records that all vessels are operated responsibly.
- To develop a sense of personal responsibility in **ALL** personnel towards health, safety.
- To show that safe operations form an essential element of efficient operations.
- To prevent avoidable accident that may cause personal injury, incidents, hardship, or pollution to the sea.

Policy

- Company's Management is totally committed to improve standards and will actively encourage and promote the levels of awareness that such standards demand. Effective training is recognized as being essential to achieve these standards.
- When considering new business or work methods, full account will be taken of all health, safety and environmental aspects to ensure that the standards required by this Policy are maintained.
- The prime responsibility for implementing this Policy lies with Company's Management Staff (those in supervisory positions). To achieve this, the commitment and involvement of **ALL** Company personnel is required. In addition the company's Health & Safety policy should be available to both each personnel and the public also.
- All work will be properly supervised with safety forming an integral part of all planning and procedures.
- Management will respond positively to recommendations from both shore and sea staff that identify the changes in policy, practices or equipment necessary to improve standards.
- All incidents of a serious or potentially serious nature are investigated and recommendations communicated through line management where appropriate.
- The personal record of each individual in this regard is considered as part of that employee's work performance.
- Procedures have been established to ensure that the Company's Vessels are maintained in conformity with the provisions of the relevant rules and regulations with additional Company requirements and equipment makers guidelines.
- In order to achieve the above, the Company:
 - Holds Vessel inspections at appropriate intervals
 - Reports any non-conformities and their portable causes (if known)
 - Ensures that appropriate corrective action is taken
 - Ensures that records of these activities are maintained
 - Monitors Vessels safety performance and reports the outcome
- Management will use its best endeavors to ensure that contractors working for the Company apply standards compatible with this policy.

2.2.3 DRUG AND ALCOHOL ABUSE POLICY

The Company's Drug and Alcohol Abuse Policy exceeds the recommendations contained in OCIMF's 'Guidelines for the Control of Drugs and Alcohol On Board Ship'. No seafarer, whatever rank, will be employed on board any Company Vessel, while impaired by drugs or alcohol or if there is a risk for such impairment.

Seafarers in service (on board or on shore leave) shall not consume alcoholic drinks:

- at least 4 hours prior to any scheduled watch keeping or work period.
- 24 hours prior to entering or operating in the territorial waters of U.S, Canada and E.Union.
- This rule will remain in effect until the ship clears these countries.
- more than 2.5 units of alcohol as per the table* below or have a Blood Alcohol Concentration (BAC) of >0.040% (40 mg/100ml blood) at any time resulting in impairing their efficiency or judgment.
- shall not commence scheduled duties with a blood alcohol concentration (BAC) >0.04%
- shall not navigate a ship or operate its onboard equipment whilst impaired by drugs or alcohol

In addition, the Company maintains a system based on breathalysers and random testing by urine sample to monitor the effectiveness of this Policy.

<i>Alcohol Limit</i>	<i>STCW Regulation VIII/1</i>	
<i>In the blood</i>	<i>0.04% blood alcohol content</i>	<i>40 mg of alcohol in 100ml</i>
<i>In the breath</i>	<i>0.25 mg/l</i>	<i>25 microgrammes of alcohol in 100 ml</i>

Any form of drug, with the exception of prescribed drugs, is totally banned from Company managed vessels. Personnel on prescribed drugs must declare this fact to the Master upon joining the vessel, or upon prescription if prescribed during the period of service onboard. The Master if on prescribed drugs must declare this fact to the company prior joining the vessel, or upon prescription if prescribed during the period of service onboard

The misuse of legitimate drugs or the use, possession, distribution or sale of illicit or unprescribed controlled drugs ashore or onboard ship or by shore staff/crew members on leave is prohibited. The Company will not authorise the employment of any persons who are users of or have a recent record of the use of illegal drugs or have abused the use of prescribed drugs. Any crew member found in contravention of the Company's drug policy will be **instantly dismissed** and handed over to the appropriate authorities for prosecution. All are reminded that in certain countries possession of illegal drugs can result in the **DEATH PENALTY**. This policy is monitored on board all vessels by the Master.

Officers and ratings are a) subject to unannounced random tests conducted by qualified personnel to Port State and Owners' requirements, b) to sign a statement of acceptance of the Company Drug and Alcohol abuse Policy

2.2.4 TRAINING POLICY

It is Company policy to:

- Ensure that personnel assigned to the various tasks connected with the provision of services offered by the Company are appropriately experienced and trained in that task.
- Identify training needs by means of on-going appraisal of individual development and performance.
- Arrange appropriate training for individuals in line with the resources available and current operational demands.
- Encourage those more experienced in the Company's business and operations to share their knowledge with less experienced personnel.
- Maintain adequate records of training and experience.
- Conduct periodic informal interviews with personnel where free interchange of opinion can take place to address both the needs of the individual and those of the Company.
- Adhere to national and international requirements for manning vessels and to ensure that the records of sea-staff are available for verification.

2.2.5 CODE OF ETHICS – CODE OF CONDUCT

The Code of Ethics and Code of Conduct (referred to hereafter also as the Codes) is based on Company's beliefs and values establishing its commitment to honesty and integrity. The main function of the Codes is to make the fundamental values and principles, which guide the activities of the Company, known within the Organization and its managed vessels and to all agents, contractors, suppliers and other parties the Company cooperates with. **The Codes apply to the whole Company and managed vessels.** The Company's management is committed to providing a work environment in which all individuals are treated with respect and dignity.

Code of Ethics and Code of Conduct

The following values and principles have been established and implemented in this respect, shared among all shore based and shipboard employees at all levels:

- The Company shore staff and seagoing personnel shall:
 - not be involved in any kind of harassment, abuse or discrimination. Workplace physical or emotional harassment will not be tolerated from any person. Regardless of gender, race, sexuality or any other defining characteristic, every person should be given the right to be free from abusive treatment.
 - not conceal any identified unsafe act or event, which affects or could affect human health and safety, the environment and the property.
 - shall carry out their duties in a professional and impartial manner. All Company employees shall act in honesty and good faith are encouraged to report in good faith any incidents of workplace harassment
- All information regarding Company's operations, projects, reports or any work carried out shall be treated as business confidential to the extent that such information does not conflict with Company's policy for safety and environmental excellence and is not already disseminated or made generally available to third parties.
- Any kind of offer, gift or bribe in any form direct or indirect, including kickbacks is strongly prohibited in all Company's operations and processes. Furthermore the Company prohibits the use of other routes or channels for provision of improper benefits to, or receipt of improper benefits from agents, contractors, suppliers or employees of any such party or government officials.
- Procurements are conducted in a fair and transparent manner.
- Management will investigate and deal with all concerns, complaints, or incidents of workplace harassment in a fair and timely manner while respecting workers' privacy as much as possible

This policy is not intended to limit or constrain the reasonable exercise of management functions in the workplace.

2.2.6 QUALITY OBJECTIVES STATEMENT & QUALITY POLICY

QUALITY OBJECTIVES STATEMENT

- *To earn the confidence of both the shipowners and charterers by providing ship management services fully complying with **Safety ISM CODE, Quality ISO 9001:2015 Standard, Environment 14001:2015 Standard, OHSAS 18001:2007 and ISO50001:2011 standard requirements and to focus on customers satisfaction** by providing flawless, cost effective services and complying to their needs and all relevant requirements.*
- *To ensure, safeguard, make consistent, optimise and improve the efficiency of **Safety, Quality, health, hygiene and Environment Protection and Energy Efficiency** management system by controlling, analysing non-conformities and taking adequate preventive and corrective actions, by risk assessment, by continual follow-up and internal audits inspections and statistical performance data and by interfacing people, equipment, material through established processes that are in full compliance with relevant international standards, in a way to achieve maximum potential to all parties concerned*
- To promote staff continuity with an emphasis on retaining and developing people in key roles and to set annually specific targets and review them quarterly in order to improve the retention rate of our Senior Officers & of shore Key Staff.
- To comply with all statutory legislation and regulatory requirements and, as well as recognized industry standards, as appropriate
- To endeavor to have ZERO accidents and incidents and Zero spills – Zero damage to the environment.
- To promote HSSE behaviors and a “no-blame” culture. Employees and contractors act proactively and routinely to identify and eliminate their personal unsafe behaviors as well as those of their co-workers. Behaviors, unsafe conditions and other precursors that can lead to incidents to be recorded, analyzed and addressed.
- To implement of behavioral based tools and always consider Cross-cultural values and attitudes between personnel irrespectively of their position/rank.
- To improve its performance in all sectors by establishing procedures to capture best practices and lessons learnt by recording and communicating these information within the Company and the fleet. When required, management follows up recommendations to ensure that all necessary changes have been made. Means of communication may include: webcasts, mission statement records, audits onboard and ashore, safety bulletins, newsletters as well as vessel's feedback.
- To improve continuously the fleet technical & 3rd party's inspections/audits performance. Minimize the number of outstanding maintenance tasks and ensure that these are resolved quickly & efficiently. Monitor the maintenance of critical equipment.
- To achieve the highest possible vessels' operational performance in terms of claims, cargo losses and required pumping performance and discharge time.
- To promote continuously & improve all shore staff and onboard personnel Environmental Awareness and Performance.

QUALITY POLICY

The Company's Top Management endeavors to provide flawless services that satisfy all relevant requirements. In this respect:

- Provide always quality, professional ship management services to Owners and Charterers protect their interests and assets under its care and fulfill all their expectations by maintaining always effective communications.
- Ensure that the SMS conforms to the requirements of the relevant international Standards, so as its processes are delivering their intended outputs and its integrity is maintained when changes are planned and implemented.
- Making experience available to the authorities and regulatory bodies and assisting in the formulation of relevant laws, regulations and standards
- Comply with all statutory requirements and legislation, and recognized industry standards shall be taken into consideration, as appropriate.
- Adopt a proactive approach concerning the needs of its clients and is responsive to their comments, requests, suggestions or complaints, always trying to improve the value of its services.
- Encourage employee teamwork, personal improvement, cooperation, innovative thinking, initiative, leadership, decisiveness, and focuses on the promotion of the client's needs and their satisfaction.
- Set measurable and meaningful health, safety, quality & environmental objectives, follows them up and reviews them regularly. Collects and analyses relevant data
- Control the SMS processes, by risk analysing and monitoring the performance, auditing, inspecting the managed fleet and taking all necessary corrective actions to remedy, mitigate and eliminate by searching for the root cause, the consequences caused after any customer or any other kind of complaint, suggestion, defect or deficiency and review any opportunity for improvement these regularly considering the need for change or innovation
- Provide adequate-sufficient resources including qualified, experienced and trained personnel which is quarterly reviewed or during significant changes to cover the Company's operational needs, as well as equipment and facilities fit for the service we offer and have training to all personnel involved in the **Company's Management System** in order to have adequate understanding of relevant rules and regulations, codes and guidelines.
- Define and documenting the organization, responsibility, authority and interfacing of all personnel who manage, perform or verify work relating to or affecting quality and support them in their efforts to adhere to the Company's processes.
- Ensure that all people ashore and on board are qualified for the work assigned to them, and are aware of the requirements of the Management system applicable to their activities, and of our intention to provide consistent quality services.

2.2.7 ENVIRONMENTAL POLICY

Company acting as the vessels Manager and Operator is committed to managing Environmental Protection and Preservation matters as an integral part of its business. In particular it is the Company's Policy regarding the Environmental protection, performance and efficiency to ensure the efficiency of Environmental procedures / processes and guidelines at all times and at all places, to provide all suitable means (equipment and material) required ashore and specifically on board its vessels. To solicit customers input in meeting Company environmental goals and in turn will offer assistance to meet their goals. And to continuously seek for opportunities to improve its adherence to these principles, through the relevant review procedures and by the use of information provided. The Company to do so adhering to the following principles:

- Employment of management systems and procedures specifically designed to prevent activities and/or conditions that pose a threat to human Health, Safety and the Environment.
- The Company will minimize risk and protect not only its employees but also under the concept of social responsibility the communities in which it operates by employing safe technologies and operating procedures, set Environmental Objectives and Targets, as well as being prepared for emergencies.
- **To endeavor to have ZERO accidents and incidents and Zero spills – Zero damage to the environment and to minimize the amount and toxicity of waste generated and ensure the safe treatment and disposal of waste as well as to reduce the permitted emissions.**
- To promote staff continuity with an emphasis on retaining and developing people in key environmental related roles.
- To comply with all statutory legislation and regulatory requirements and, as well as recognized industry standards, as appropriate by implementing a series of Environmental programs onboard the ships and ashore.
- To promote HSSE behaviors and a “no-blame” culture. Employees and contractors act proactively and routinely to identify and eliminate their personal unsafe behaviors as well as those of their co-workers. Behaviors, unsafe conditions and other precursors that can lead to incidents to be recorded, analyzed and addressed. Implementation of behavioral based tools.
- To improve continuously the fleet technical & 3rd party's inspections/audits performance. Minimize the number of outstanding maintenance tasks and ensure that these are resolved quickly & efficiently. Monitor the maintenance of critical equipment.
- To achieve the highest possible vessels' operational performance in terms of claims, cargo losses and required pumping performance and discharge time.
- To communicate, promote continuously & improve the Environmental Awareness of all shore staff, onboard personnel and to its customers and subcontractors and provide adequate training to all personnel at sea and ashore on existing requirements and in information for the compliance with the new ones
- To promote continuously & improve the environmental fleet and office performance and its monitoring both onboard ships and at office premises.

2.2.8 ENERGY EFFICIENCY MANAGEMENT POLICY

Company has adopted the following Energy Efficiency Management Policy, which sets out the Company's Top management commitment to achieving continual improvement in energy performance. The method for this policy's external communication is subject to CEO approval.

Having established and implementing an Environmental Management System certified in accordance with ISO 14001:2015, believes that although shipping is by far the most fuel-efficient mode of transport, nevertheless additional action has to be taken to further improve the energy efficiency of ship related operations. The increased energy efficiency will eventually result in increased environmental protection by reducing air emissions as well as in improved operational performance by reducing energy cost. Energy efficiency is controlled primarily through well-planned and properly managed ship operations and needs the personal commitment of everyone involved in the above tasks.

With the aim of enhancing the energy efficiency of the ship operations, Company is committed to:

- Establishing, documenting, implementing, maintaining an Energy Management System in accordance with the requirements of ISO 50001:2011, with the objective of continually increasing energy efficiency and minimizing energy waste. A set of objectives and time-specific, measurable - whenever practicable and possible - and attainable targets are to be established and maintained, and should relate to a combination of design optimization, in-service performance monitoring and best-practice operational management processes.
- Establishing and maintaining a Company Energy Efficiency Management Plan (**CEEMP**) & a Ship specific Energy Efficiency Management Plan (**SEEMP**), which should be regularly reviewed by the senior management. This Plan, which applies to all fleet vessels, provides standard procedures and practices on best energy management under the various operational modes of each vessel.
- Ensuring the availability of information and of necessary resources to achieve the set objectives and targets.
- Promoting energy efficiency awareness through training to the shore and sea-going personnel and implementing energy related campaigns and other relevant personnel incentive/motivating programs.
- Promoting co-operation within the shipping industry with the aim of facilitating energy efficient operations.
- Monitoring and complying with all applicable legal and other requirements related to ship energy management.
- Supporting the purchase of energy-efficient products and services, and design for energy performance improvement.

The Company's Energy Efficiency Management Policy should be periodically reviewed with the aim of being kept always updated so as to function as the driver for the continual improvement of energy efficiency.

2.2.9 WHISTLE-BLOWING POLICY

The Company considering the impact a whistle-blowing incidents in the US has developed certain policy and guidance to encourage the proper behaviour by all its crewmembers. All staff are required to comply with International Law as mandated by IMO conventions, such as SOLAS and MARPOL, and the National Laws of the Port State the vessel is in.

If, at any time, a member of staff knows of, or suspects, any of the occurrences listed below, they must report the matter immediately so that steps can be taken to deal with it appropriately. Failure to notify in these circumstances is considered as grounds for disciplinary procedures, which includes up to dismissal.

The following are examples of matters, which qualify as information, which may be raised under this policy:

- A crime is being, or has been, committed, is suspected, or is likely to be committed;
- Non-compliance with legislation and/or Company procedures, particularly in relation to health and safety at work;
- The environment has been, or is likely to be, damaged;
- Dishonesty, either verbally, written or through intentionally maintaining official log books or records inaccurately;
- Malpractice or unethical conduct;
- A breach, or likely breach, of any legal obligation or regulatory requirement;
- Miscarriages of justice; and
- The deliberate concealment of any of the above.

Notification

If a member of staff has a legitimate concern in (and holds a reasonable belief that the information he/she has relates to) one of the above areas and he/she wishes to raise the concern in good faith, it should be raised with his/her Head of Department for resolution. If a member of staff prefers not to raise the matter with his/her management or the member of staff feels his/her management has not addressed the concern adequately and he/she wishes to raise the concern in good faith, he/she should raise this concern either by call, e-mail or other text msg to DPA

Commitment to no repercussions

Reports shall be made without fear of reprisal and may be anonymous. Any victimization of a member of staff who “whistle-blows”, or any attempt to deter him/her from “whistle-blowing”, will be regarded as a serious disciplinary offence and will result in action under the Disciplinary Procedures.

2.2.10 SOCIAL MEDIA POLICY

The use of social media increases opportunities for Company employees to remain engaged with the world beyond their immediate work environment. It also allows employees to generate content from anywhere in the world. Therefore, as communication opportunities increase so do responsibilities for Company employees. This policy outlines the necessary principles that users of social media shall observe, the conditions in which Internet activity will be monitored and actions to be taken upon violation of an established policy.

This policy deals with the use and misuse of social media platforms and other websites including but not limited to:

- Social networking websites sui.eFacebook, MySpace, Bebo, LinkedIn, Yahoo! Groups, QQ.com
 - Micromedia/Microblogging websites such as Twitter
 - Multimedia websites such as YouTube and Flickr
 - Online Encyclopaedia sites such as Wikipedia
 - Blogs
 - News sites where content and comments can be posted such as CNN iReport
 - Any other website where user-generated content can be posted for wider viewing and sharing.
- Company expects all individuals to comply with this policy at all times to protect the company brand and reputation.

This policy applies to all individuals working at all levels in the Company both ashore and at sea and covers the use of social media during work and non-work hours, on personal and Company supplied equipment such as laptop computers and cellular/smart phones. Company management and Masters / Chief Engineers are responsible for ensuring that the standards set forth by this policy are communicated to their staff and that their own conduct sets a good example in this respect.

Company's employee rules relating to the use of social media

The Company recognizes the value of social media and expects all staff to use these tools responsibly, protecting the Company's reputation, as they would in traditional media. The following basic principles should be observed:

- Be responsible. As an employee, any user-generated content could have an impact on the Company's reputation, so give careful thought before sharing photographs or video of the Company's assets, particularly our ships, facilities or people in uniform. Photographs and/ or videos taken during an incident that could potentially be harmful to an investigation is prohibited.
- Be accurate and honest. In any circumstance in which you are in doubt, or are uncertain about how to respond to a post, contact the DPA for guidance;
- Don't make posts or comments that may be considered obscene, threatening, harassing or embarrassing to others;
- If you post photographs of other people, get their permission first;
- Never use someone else's copyrights, copyrighted material, trademarks, service marks or other intellectual property;
- If you see comments relating to the Company that you think should be addressed, contact the DPA for guidance;
- Do not use the Company's logo (in any form) on any personal social media platform. Use of any company logo must be approved by CEO;

- Respect others in any online social interaction. Do not use social media or any similar form of communication to attack or insult the Company's fellow employees, customers, vendors, contractors, suppliers, competitors or others.
- Employees are referred to Company's policies on cultural awareness, ethics and gender equality which extend to all forms of communications, including the use of social networks and other new media.
- Do not disclose any confidential, proprietary or sensitive information about the Company, our employees, customers, vendors, contractors, suppliers, competitors or others.
- Do not comment on the Company's related legal matters, financial performance, competitors, strategy or rumors.
- If any member of the media (social or traditional) contacts you about your user-generated content (i.e., blog post, comment, video), a colleague's or another party's do not engage in a dialogue rather refer them to DPA.

Violations

Please be aware that violation of this policy may be grounds for disciplinary action up to and including termination of employment.

Social Media Guidelines

The Company respects the desire of all its employees to participate in online social media, however the emergence of social networking forums such as You Tube, Facebook, Twitter, Wikipedia etc has blurred the traditional expectations of what types of speech are regarded as public and what are private. Information published on social media forums is now almost always considered to be public information and can subsequently be used by others online, including journalists. The below guidelines are designed to outline a sensible philosophy towards employee use of social media.

- **Be Aware**– Social media exists between the public and private spheres. Your views and actions online can impact company reputation. Be aware of this and the consequences it can involve.
- **Be Accurate** – Never publish inaccurate information regarding the Company online. If you are unsure of the accuracy of what you are writing, check with Corporate Communications who are always there to help.
- **Be Yourself** – Social media is a forum for you to represent your own views and ideas. Always ensure that if you are talking about the Company online that you have made it clear any statements are your own and do not represent the views or values of the organization.
- **Be Respectful** – avoid violating the privacy of your co-workers, clients and competitors etc.
- **Be Accountable** – A general rule of thumb would be not to post online what you wouldn't be comfortable saying to people in person or in public. Would you be comfortable if your comments were seen by your Mother, friends, colleagues or employer?
- **Be Considerate** - Never use social media as a platform to harm, insult, threaten, defame or embarrass others.
- **Be Conscientious** – If you find hurtful or defamatory commentary about the company on social media forums, help us combat such negativity by informing Corporate Communications who can respond appropriately.

Help us Maintain the Company and Your Own Positive Reputation Online!