

Human Resource and Occupational Health Policy

WSM believe and appreciate that a good and healthy working environment and healthy and competent employees are one of the cornerstones of productivity and success of the company.

It is WSM policy to be recognised as an actively health conscious company and to ensure that our organisation is staffed by healthy and competent personnel.

The Company has established procedures and guidelines to:

- Comply with all applicable laws and regulations governing health at employees workplaces;
- Maintain proper, fair and effective recruitment procedures;
- As far as possible, accommodate any different physical and physiological needs of an individual's work situation;
- Allocate high priority to the training, development, motivation and medical fitness of employees to have a preventive effect on undesired events and sick leave;
- Review health risks related to operations and take reasonable steps to reduce risk;
- Provide health related information and training and encourage employees to live healthy lifestyles;
- Give high priority to suggestions related to health improvement;
- Ensure line management has defined responsibility for appropriate guidance and training to employees so they can fully master their role and work responsibilities as described in their functional description;
- Establish regular performance appraisal and performance measures to maintain competent and qualified personnel;
- Encourage employees to develop their career with WSM;

The commitment and participation of every Company employee is essential to the success of this policy and all personnel shall at all times comply with health and safety requirements.

This policy directs all employees ashore and on ships to recognise their role for the health and safety of themselves and their colleagues.

It shall be distributed to and read by all persons within the organisation and made available to other interested parties upon request.



Carl Schou
President Wilhelmsen Ship Management
Rev. 01/16

Security Policy

It is WSM policy to provide a secure working environment to prevent acts which endanger the security of personnel and Company vessels.

The Company has established procedures and guidelines to maintain required security measures by:

- Appointing trained Company Security Officers responsible for developing, implementing and maintaining the WSM Security Management Program for vessels under full technical management;
- Designating trained Ship Security Officer (SSO) on each vessel responsible for ensuring that the Ship Security Plan and the preventive measures in the Plan are implemented and maintained at all times;
- Allocating responsibility to each ship management office to ensure ISPS code compliance for vessels under full technical management and that any equipment required by the ISPS Code is available on-board;
- Active promotion of security awareness at all levels of WSM organization through training, drills and familiarization;
- Regular training, drills and exercises on-board to verify that all personnel have an adequate understanding of the security measures and improve their security management skills;
- Prompt investigation and actions by the company for deficiencies that have an effect on security;
- Hardening vessels as deemed necessary in accordance with industry and Company guidance.

The Master of the vessel has the overriding authority and responsibility to make decisions with respect to security issues and to request assistance from Company Security Officer or any contacting government as may be necessary.

The commitment and participation of every Company employee is essential to the success of this policy. All employees must always be alert at all levels of the organization - from recruitment to vessel operations to information management and within any business dealings.

This policy directs all employees ashore and on ships to recognise their role for the maintenance of security requirements.

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Safety and Quality Policy

It is WSM policy to provide safe and high quality ship management services by having management systems and operating procedures in place.

The Company has established procedures and guidelines for safety excellence to:

- Comply with mandatory rules and regulations and take into account other relevant practices as required by the ISM Code;
- Follow the Guidelines on the Implementation of the ISM Code;
- Provide safe operating practices and a safe working environment;
- Assess all identified risks to our vessels, personnel and the environment and establish appropriate safeguards;
- Continuously improve safety management skills of all personnel;
- Prepare for emergencies;
- Encourage near-accident reporting and investigation by adopting a “just culture” approach;
- Learn from undesired events (accidents, near-accidents, non-conformities, hazardous situations) through analysis of causes and prevent recurrence through improved compliance;
- Review the Management System at regular intervals to verify the overall effectiveness of the system in achieving stated objectives;

The Company has established operating practices for quality excellence to:

- Comply with the requirements of ISO 9001;
- Establish, document, implement and maintain a quality management system;
- Continually improve quality management practices;
- Ensure that customer requirements are determined and met with the aim of enhancing customer satisfaction;
- Learn from undesired events (accidents, near-accidents, non-conformities, hazardous situations) through analysis of causes and prevent recurrence through improved compliance;
- Review the Management System at regular intervals to verify the overall effectiveness of the system in achieving stated objectives;

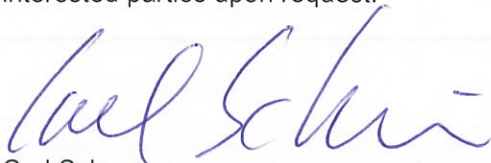
The responsibility for the Safety and Quality of ship management services rests with the Head of respective ship management office. Designated Person(s) as per the requirements of the ISM Code shall be appointed. He/she shall have direct access to the highest level of management.

The Master has the overriding authority and responsibility to make decisions with respect to safety and pollution prevention and to request the Company's assistance as may be necessary.

The commitment and participation of every Company employee is essential to the success of this policy. All personnel are reminded to take 'time out for safety' to properly plan before any operation is conducted and 'stop the job' if you see and/or are in doubt as to the successful outcome of any operation.

This policy directs all employees ashore and on vessels to recognise their role for the safety and quality of services.

It shall be distributed to and read by all persons within the organisation and made available to other interested parties upon request.



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Environmental Protection Policy

WSM recognizes that the maritime operation of vessels in its managed fleet involves risk to the environment.

It is WSM policy to implement and continually improve environmentally sound practices to reduce that risk.

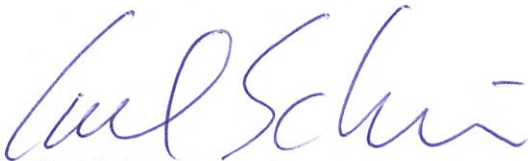
The Company has established procedures and guidelines to:

- Ensure that managed vessels are operated in accordance with MARPOL and other applicable maritime legislation.
- Have zero spill and zero tolerance of non-compliance with the above
- Employ personnel who are able to effectively supervise and carry out environmental protection as defined in the operating procedures
- Provide suitable training of personnel for the effective use of the operating procedures;
- Emphasize pollution prevention measures by conducting investigations of shipboard accidents/incidents and "near-accidents" and use the results to prevent recurrence;
- Maintain effective contingency plans to be employed in the event of environmental emergencies;
- Study the environmental aspects of activities and identify those considered to have significant impacts and draw up programs to reduce their effects;
- Continuously seek improvements related to environmental protection by reducing the energy consumption where applicable and minimising wastes, effluents and emissions from vessels;
- Set objectives and targets and continually monitor progress;
- Take account of Owners specific requirements as part of the implementation of this policy;

The commitment and participation of every Company employee is essential to the success of this policy.

This policy directs all employees ashore and on vessels to recognise their role in environmental protection.

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Drug and Alcohol Policy

It is WSM policy that Drug and Alcohol on board ships is strictly managed and the misuse of legitimate drugs or the use, possession, distribution, or sale of un-prescribed drugs is strictly forbidden on board vessels.

Any violation of the Drug and Alcohol Policy by officers, members of the crew, family members or any person visiting the vessel for any purpose, is grounds for dismissal from the ship. It is everybody's responsibility to immediately report violations to management onboard or ashore.

The Company has established procedures and guidelines to:

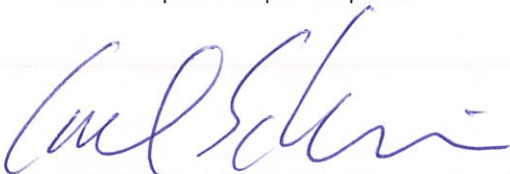
- Ensure no drugs and alcohol are brought on-board by officers, members of the crew, family members and any person visiting the vessel for any purpose;
- Prohibit the taking on board any more than a reasonable quantity of legitimate drugs;
- Ensure the sale of alcoholic beverages on-board shall be strictly in accordance with the rules laid down in WSM instructions and circulars;
- Prohibit the consumption of alcoholic beverages (including beer) during working hours or when working overtime; this includes the period of four (4) hours prior to the start of work or watch duty;
- Set and enforce limits so that consumption of alcohol prior to the 4 hours' prohibition period resulting in a blood alcohol content above 0% when starting work or watch duty and exceeding the maximum blood alcohol content of 0.04% when off duty is not permitted. Any misconception of the level of alcohol levels does not exclude disciplinary and legal action;
- Respond to accidents or casualties on-board by testing all directly involved personnel for drug and alcohol impairment as soon as possible afterwards;
- Provide that all officers and crew serving on-board vessels shall be subjected to testing and screening for drug and alcohol abuse during routine medical examinations;
- Ensure that "no-notice" drug and alcohol testing may be performed at random on board tankers, gas carriers and offshore vessels or as required by customers;
- Ensure procedures are in compliance with the OCIMF guidelines and Exxon Mobil Marine Environmental and Safety Criteria;
- Comply with any Customer's Drug and Alcohol policies, if stricter, which overrides WSM instructions and guidelines;

WSM supports efforts to combat illegal drug trafficking and will comply with the preventive measures as per the International Regulations.

The commitment and participation of every Company employee is essential to the success of this policy and it must be recognised that the level of alcohol consumption on-board reflects the fact that emergencies may arise at any point in time.

This policy directs all employees ashore and on ships to recognise their role in the safe and controlled use of alcohol and drugs on board ship.

It shall be distributed to and read by all persons within the organisation and made available to other interested parties upon request.



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