

1. Health and Safety Policy

HBC Group's Health and Safety Policy is to always provide a safe and healthy working environment and living conditions for all its employees and employees of sub-contractors working for the Group and anyone else affected by the Group's activities. HBC Group has a strong commitment to prevent injuries and ill health at all of Group's work sites by providing appropriate tools, equipment, well-educated and experienced work force, proper safety procedures and providing full support with reference to Health & Safety matters.

HBC Group commits to comply with all applicable legal requirements, especially those stipulated by legislation of countries in which HBC conducts works, international regulations and ISO 45001 standards. HBC Group continuously monitors Health and Safety parameters of all aspects of work in order to determine performance. The performance is measured as objective factors defined by Safety Management System (SMS). SMS defines set of goals which should be reached within given period of time and improved.

HBC Group commits to continual improvement of the H&S system and H&S culture within the Company and to encourage continuous improvement of safety awareness and safety management skills at all levels within HBC Group and its sub-contractors.

The Management of the Group commits to encourage the active involvement of all workers, employees and sub-contractors to promote and improve standards of H&S. Especially by holding frequent Safety Meetings directly on work site, promoting safety culture and regular and pro-active safety inspections by the staff (crew) themselves.

2. No blame policy

HBC Group operates a no blame culture. Anybody can call a "stop work" if he/she feels unsafe or to suggest improvement or change of procedure. The site managers are obliged to consider each safety observation/suggestion. No one is to be blamed for asking, clarifying or pointing out shortcomings. Any near misses, accident, or incident that occurs are reported and analysed based on the reports. Feedback from such reports helps to prevent the recurrence.

3. IT, media and social media policy

HBC Group has a policy that no information about the work can be given to media, including posting information, pictures, movies, etc. on social media without permission of the HBC Managers and Clients.

4. Safety Management System (SMS)

In order to follow Group's Health & Safety policy the Group has implemented Safety Management System (SMS) containing all HSE-related procedures. SMS determines exact time frames for revisions of HSE procedures and gives schedule for HSE inspections. SMS has been implemented in accordance with the requirements of ISO 45001:2018. Quality Management System (QMS) has been implemented in accordance with the requirements of ISO 9001:2015. SMS system and HSE procedures are part of QMS. All HSE-related issues are dealt with according to procedures set up in SMS as part of QMS.

5. Responsibilities.

Health & Safety protection are management responsibilities ranking equally with responsibility for finance, marketing and similar economic and commercial matters. Management accepts its duty to ensure that all reasonable practicable steps are taken to provide and maintain safe and healthy conditions on board its ships and premises. Management accepts a similar duty in respect of the design, construction and operation of all plant, machinery and equipment.

The Managing Director has the overall responsibility for H&S matters. Parts of H&S responsibilities are delegated to Department Managers and Site Managers as per SMS and QMS, however, the core responsibility lies with the top management of the HBC Group. Managing Director and HSEQ Manager provides a point of reference for Department and Site Managers faced with a conflict between the demands of safety and demands of operation.

The responsibility for Health and Safety individual protection lies directly and personally with all personnel employed by any member of HBC Group and its sub-contractors from the Managing Director to individuals on the work site. It is the duty of all employees, included the employees of sub-contractors to act responsibly in order to prevent injury to themselves or fellow workers, prevent loss of property and damage to the environment. If employees act irresponsibly in this respect, they will be subject to disciplinary actions as per their employment code of conduct.

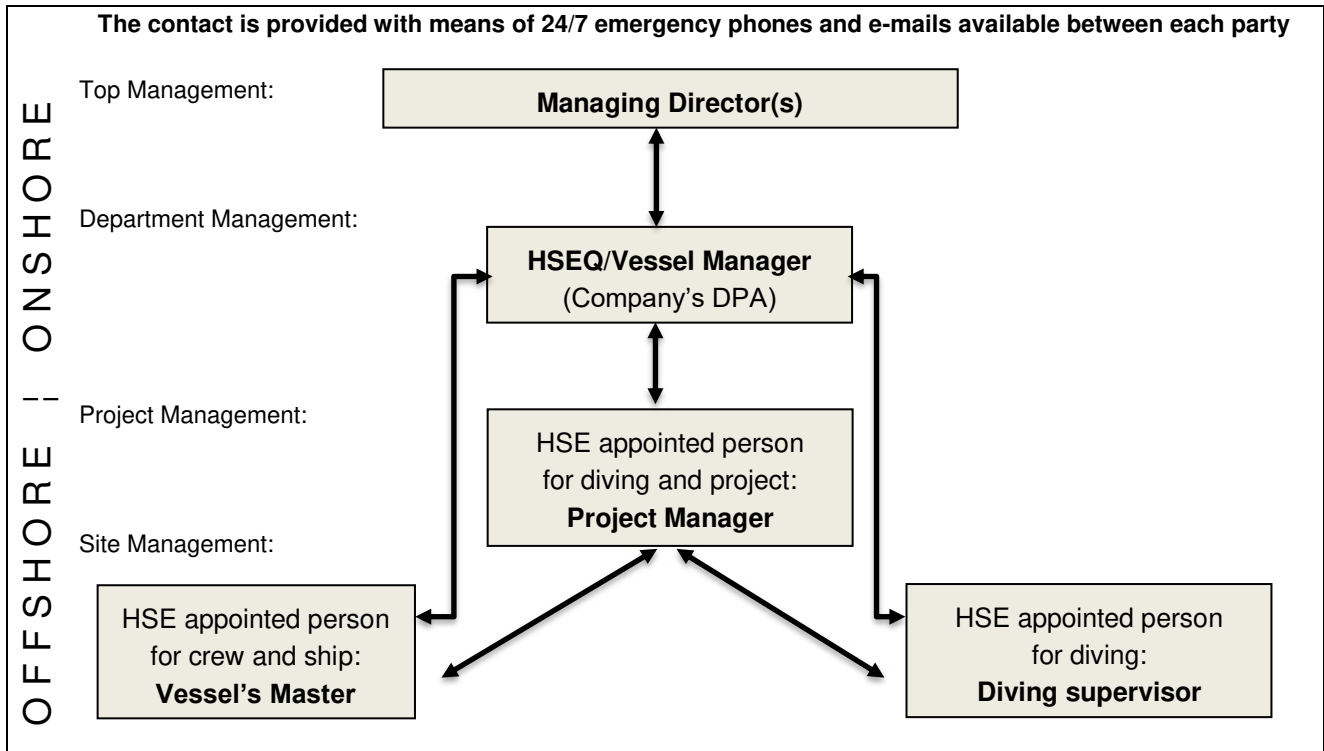
6. Inspections and revisions.

The Management of the Company will continuously monitor the safety, health and environmental policy by updating the Policy frequently and consulting it with the Company's Department Heads. The Management of HBC Group will:

- Revise H&S policy not less frequently than every 12 months.
- Perform frequent HSE inspections, Quality inspections and Internal Audits (referred to hereinafter as *QHSE inspection*) of vessels belonging to HBC Group as per schedule laid down in SMS and QMS.
- Perform quarterly QHSE meetings of Top Management with Department Management. Reports and minutes from these meetings should be stored in archive for at least 2 years.
- Make the necessary resources available to encourage all employees and sub-contractors to pay maximum attention to safe working practices and standards laid down by the Group and Statutory Authorities.

- Make available protective clothing, equipment and first aid facilities to all personnel potentially at risk and to combat hazards that cannot effectively be eliminated, reduced or controlled in any other way.

7. Safety management organisation.



8. Duties of Site personnel.

Every person working for HBC Group and sub-contractors has a responsibility to apply the principles and be conversant with the QMS, SMS and H&S policy, the documentation references within the systems, and their duties and responsibilities outlined within it. In particular:

- To attend Safety Meetings,
- To bring to the attention of the appointed Safety Officer on board, or the safety Representative onshore any dangerous occurrences, near misses or risks to safety, health and environment.
- To promptly report any accident, incident, near miss or potential danger to such person and actively participate in any subsequent investigation.
- To ensure that all equipment provided in the interests of safety and health is readily available as required, properly used and to report any deficiencies with such equipment.
- Not to misuse any equipment provided for safety, health and environmental protection



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DRUG, ALCOHOL and SMOKING POLICY

1 Hazards

Any intoxicated person on a work site presents a hazard to him/herself, other persons and safety of the operation. Therefore it is HBC Group's policy to ensure that no such hazard is created.

2 Consumption of alcohol and narcotic drugs

- **Consumption of alcohol and use of narcotic drugs while on work site is strictly prohibited.**
- No alcoholic beverages or narcotic drugs may be brought to any work site.
- At no time while on work site shall any person be intoxicated.

3 Work site

For the purpose of this document term "work site" means any place where any Employee of the HBC Group is performing work either for HBC Group or its subcontractors.

For protection of the work site and in order to maintain record of persons going and out of the vessel - gangway system will be strictly adhered to. Any movement to/from the vessel will be recorded in gangway logbook. The logbook will be kept by the officer on duty or on the bridge.

4 Screening

Ships of HBC Group are considered as special work sites. For the sake of safety on board it is of utmost importance that all personnel on board – including, crew, divers, riggers and also visitors – is covered by a **zero tolerance policy** regarding usage of alcohol and narcotic drugs. For the sake of this policy:

Regular, monthly random tests will be performed by an external company. The exact date will be random, but it will happen at least once every calendar month. Charterer (Client) has full right to call for external testing and test all of the crew.

It is the Master, HBC's Management or Client representative on board who has a right to, in case of any doubt on sobriety of the crew members or site workers, perform alco-test with alcometer. If such test is performed, then the following rules apply:

- every person on board to be tested,
- refusal to undergo alcotest will result in immediate dismissal from the Vessel,
- after every incident there will be obligatory screening of all persons involved and on-duty at the time of incident
- alcometer available on board will be calibrated according to producer's recommendations but not less often than once a year

HSE Manager will conduct D&A screening during visits to work site, results of which will be included in HSE reports.

5 Shore leave

Any person suspected of being under influence of alcohol or drugs will not be allowed on board but escorted to a hotel by a DMT or Chief Officer (holder of STCW Medical Care cert.) and kept under supervision until is sober and grievance procedures will be introduced, or – in case of possible life or health threat – will be escorted to hospital.

6 Campaigns

Company will be lead campaigns focused on drug and alcohol and influence of these substances on health, well-being, and ability to perform work.

7 Smoking policy

It is FORBIDDEN to smoke anywhere inside the ship's accommodation or on the work site. Designated smoking place on each ship is the aft deck. Furthermore, it is forbidden to use electronic cigarettes on the bridge, mess room, galley and dive control.

ANY BREACH OF THIS POLICY WILL RESULT IN IMMEDIATE DISMISAL



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