

S-2.1 Boluda Towage Norway Policies

1. PURPOSE

The company policies shall provide the direction for the business management system (ISO9001-2015, ISO14001-2015 and the ISM-SMS) and act as the code of conduct for all Boluda Towage Norway and MT Crewing employees.

2. SCOPE OF APPLICATION

The policy is the direction for how the company operate. Nothing prevents any employee / sub-contractor to take responsibility / authority to avoid injuries / non-conformities or reducing the exposure to risk, even if actions required are not listed in any system. All employees of the Company shall contribute in line with the guidelines/direction established.

3. THE COMPANY SHALL

- a. Make use of the Rimorchiatori Code of ethics as reference.
- b. Respect the Universal Declaration of Human Rights
- c. Satisfy all applicable mandatory rules and regulations as specified by Administrators, Class and Authorities as ensuring that the tugs have all valid certificates as required to operate
- d. Make sure tugboats, mooring boats, vehicles a well maintained, fully able to deliver services to the customers and all safety equipment in top shape.
- e. Have a preparedness solution established to handle emergency situations
- f. Operate according to the principles of ISO 9001, ISO 14001 and ISM Safety Management System
- g. Be committed to continuous improvement of safety, quality, environmental issues
- h. Develop required competence and arrange for required training
- i. Make extensively use of safe job analyses and risk assessment
- j. Report and analyze all injuries, incidents, near miss as well as operations and use the same to reduce possible future risk and enhance the precaution
- k. Share the result of non-conformity analyses with stakeholders involved
- l. Encourage and not blame, those reporting incidents where involved directly or as witness/observer

4. QUALITY POLICY

Objective = Make it right the first time

The key success factor is risk assessment, proactive planning and communication internally and with the customers. Un-necessary risk-taking enhance exposure to unexpected incidents as drain everybody's recourses and put everyone's reputation on stake. Proper planning will enable advance detection and pro-active handling challenges. Appropriate communication might keep stakeholders updated and reduce uncertainties and thus making the life easier for all involved in the operation.

5. SAFETY POLICY

Objective =Avoid unnecessary risk

The key success factor is everyone's risk management attitude. Risk management is thinking forward to identify

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possible exposure to unsafe environment and to take actions as secure the safety of the employee, colleges or anyone else involved in an operation. Effective risk management is measured by registrations in our Improvement System.

6. CUSTOMER POLICY

Objective= Act trustworthy and be reliable

The key success factors are to make our best endeavors to avoid damaging customers assets, major difference between commitment and actual delivery, demurrage/waiting not communicated or lack of clarification prior to accepting the job. Proactive communication and a clear understanding of the expectations will reduce the risk of creating disappointments increase the satisfaction among stakeholders.

7. ENVIRONMENTAL POLICY

Objective = Minimize the environmental impact

Key success factor is a continuous focus to reduce the environmental impact. Our attitude should be to take on any opportunity to reach our objective. We must specifically do our outmost to focus on the following possible harms to the environment: Engine emission, garbage not disposed properly, black/grey water not disposed properly, smoke, smell and noise affecting residential areas.

8. ETHICAL POLICY

Objective =Abuse of human rights shall not be tolerated

The key success factor is to ensure that our interaction internally/externally is based on respect, responsibility and confidentiality. Ethical abuses are, but not limited to, illegal business methods, harassment of others of any kind or untruthful behavior.

9. DRUG AND ALCOHOL POLICY

Objective = No crew under intoxicating influence

It is not allowed to be under the influence of – or drink alcohol or other intoxicating means during the signed-on period, the journey to and from the ship included. The company can, at any time, demand an employee to take a test to reveal any abuse. Violation of this policy might result in an immediately dismissal. Please note specific guideline.

10. PERSON DATA POLICY

Objective = No leakage of personal information

All information related to present and previous employees, are handled strictly confidential and safely stored as per the Personal Data Act. These data are kept fulfilling legal obligations and will not be released unless released by the employee or imposed by the Law. The data will be deleted when no longer required by the Company.

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