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Reference


ISM Code Assembly Resolution A.741(18) - Chapter 2: "2.1 - *The Company should establish a safety and environmental protection policy which describes how the objectives, given in paragraph 1.2 (of the ISM Code – see "Reference" of Chapter 1 of this manual), will be achieved.* 2.2 – *The Company should ensure that the policy is implemented and maintained at all levels of the organization both ship based as well as shore based.*"

Purpose

The purpose of this chapter is to summarize the fundamentals Company Policies of the **H2Offshore Srl**:

- The Safety and Environmental Protection Policy
- The Drug and Alcohol Policy
- The Non-smoking Policy

In order to be sure that all the persons of the Company and the personnel embarked on the ships are informed about the **H2Offshore Srl** Company Policies, this chapter of the Safety Management Manual must to be printed out and affixed on the adequate showcases both in the offices and on board

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3.1 Safety and Environmental Protection Policy

The Company recognizes and identifies the Safety and the Environment Protection as themes of the primary importance of its policy.

In order to obtain the best results in terms of Safety and Environment Protection, the **H2Offshore Srl** demands that all the Company personnel both in offices and on board the ships managed shall do the best effort to achieve the following main Company's objectives (listed in order of priority):

- To avoid the person's injuries or loss of human life.
- To protect the environment in general and the marine environment in particular.
- To achieve and to maintain the best efficiency of the ships managed.
- To protect the ships and the crew members from the consequence of illegal affairs.
- To manage the ships and the related marine technical operations with safety and efficient competences.


The Company fixes that the Master shall always apply his attitudes, using the necessary competences and procedures, to give priority to those essential actions which serve to reach the above mentioned items also in case of a presence of a divergent interests due to the economic factors.

To achieve the main objectives mentioned, the Company has issued and approved the Safety Management Manual and other sets of instructions and procedures in order to:

- Guarantee the efficiency of the Safety and the Environment Protection as regulated by the national and international regulations and laws.
- Define the Company organization.
- Assign the necessities and qualified personnel resources for each Company Department both in offices and onboard, identifying the personnel responsibilities and the methodologies to use for an appropriate management of the ashore and on board departments.
- Improve the technical competences and the operational efficiency of the personnel ashore and onboard.
- Apply the correct methodologies to achieve a correct Maintenance Plan of the ships and of the equipment.
- Define the Shipboard operations procedure for any activities performed.
- Apply the industrial standards rules and methodologies in the maritime/offshore fields.
- Define the actions to undertake against the identified risks or emergency situations.
- Be always ready to manage any possible emergency situations.

The Company through its Managing Director designates the DPA as the link between the Company ashore and the ships managed. He has direct access to the highest level of management and his responsibilities are:

- Manage and control the application of the SMS and of its SMM.
- Manage the SMS in collaboration with the Masters, the Chief Engineers and Officers of the ships managed.
- Manage the relationship with the Authorities and the Class Register.
- Attend, in collaboration with the Technical Manager, in the every technical internal audit on board and in the compulsory inspections and relationship with the Authorities and Class Register.
- Monitoring the safety and pollution-prevention aspects of the ships managed.
- Ensuring that the resources and shore based supports are adequate for an effective implementation of the principles established in this manual.

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- Ensuring that the corrective action is taken as and when necessary.

The Company has established a set of procedures to inform and to train the personnel ashore and onboard about the SMS (see [Chapter 6 "Shipboard organization"](#); [Chapter 7 "Personnel management"](#) and [SMM FORM CRW-C "Instructions for new signing-in seafarer"](#); [SMM FORM CRW-E "Familiarization check-list for Deck Officers"](#); [SMM FORM CRW-F "Familiarization check-list for Engine Officers"](#); [SMM FORM CRW-G "Training of the Seafarers - Record-Book"](#); [SMM FORM MAN-M "Training record of the ashore personnel"](#)). The Company, when it is not differently indicated, has also established that the useful documentation are always accessible both on board and in the office in the appropriate Libraries for the interested persons that would like to consult them.

The Company demands that its own personnel always do the better to reach the objectives explained above.

It is good to highlight that the Master is always the persons that have the highest authority and the responsibility to manage the ships to obtain the best results in terms of Safety and Environment Protection, also when his decisions are not in agreement with the Company procedures.

The Master shall always and immediately communicate to the DPA every not-conformity and/or accident related to Safety and Environment Protection matters.

The Company verifies, revives and evaluates the appliance of the Safety Management System and the Company's policies and procedures, in order also to improve and/or to modify them if deemed necessary.


3.2 Drug and Alcohol Policy

The Company is committed to maintaining a safe and healthy workplace free from the influence of drugs and unauthorized use of alcohol.

Employees are **H2Offshore's** most valuable resource and their health and safety therefore is a serious concern. The Company will not tolerate any drug or alcohol use which imperils the health and well-being of its employees or threatens its business.

Individuals who use illegal drugs and abuse other not permitted substances, on or off duty, tend to be less productive, less reliable, and prone to greater absenteeism, resulting in the potential for increased cost, delay and risk in the Company's business. Furthermore, employees have the right to work in an alcohol and drug-free environment and to work with persons free from the effects of alcohol and drugs. Employees who abuse alcohol and drugs are a danger to themselves and to other employees.

The use, possession, distribution, manufacture, dispensing, transferring, purchase, sale, or being under the influence of any illegal substance by any person while on Company locations or while engaged in Company business is prohibited. Any other use of a substance which causes or contributes to unacceptable job performance or unusual job behavior is also prohibited. Any employee who brings, possesses, manufactures, dispenses, is under the influence of, uses, transfers, purchases, sells, or attempts to sell on Company property or while on Company business, at any time, any form of narcotic, drug, or hallucinogen, is subject to immediate dismissal. Any other person violating this policy will be removed from

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Company premises. In appropriate cases, local law enforcement agencies will be advised of violations. Physician-prescribed medications are permitted, providing they do not adversely affect job performance or safety of the employee or others in the workplace.

Illegal substances include: opiates, including heroin; hallucinogens, including marijuana, mescaline and peyote; cocaine; any prescription drug, including amphetamines and barbiturates, which is not obtained and used under a lawfully issued prescription; any other substance considered illegal by the Italian and/or Ship Flag Country laws and regulations.

The unauthorized use, possession, distribution, purchase, or sale of alcohol by any person while on Company premises is prohibited. On occasion Company may authorize the serving of alcoholic beverages. Such authorization must be made by the Managing Director. In regard to these events, all employees are expected to follow the course of moderation.

Any person under the influence of alcohol is prohibited from entering Company premises or engaging in Company business. Employees who violate this policy are subject to immediate dismissal. Any use of alcohol which causes or contributes to unacceptable job performance is also prohibited. Violation of this policy by an employee will be cause for disciplinary action, up to and including discharge.

All marine crew members, employees and technicians aboard a ship may be subject to drug and alcohol testing, as regulated by the Italian and/or Ship Flag Country laws and regulations.

3.3 Non-Smoking Policy

Smoking is not allowed anywhere within the interior spaces of ships managed by the Company. There are NO exceptions to this policy. Smoking may be allowed on the weather decks, as long as said activity does not interfere with the general practice of good seamanship.

Approved by



Antonio Fiore
The MANAGING DIRECTOR