

SMOKING POLICY

As part of its continuous review of health and safety matters, the Company has considered the current evidence of the health risks associated with passive smoking, as well as the discomfort suffered by non-smokers exposed to tobacco smoke.

The aim of the smoking policy is to guarantee the right of non-smokers to breathe smoke free air at work, whilst also taking into account the needs of those who smoke. The policy is not concerned with whether people smoke, but with where they smoke whilst on our premises.

This Policy has been written in accordance to The Health Protection (Control of Smoking) Law of 2017 duly amended, which explicitly prohibits workers from smoking in working premises.

STATEMENT

Scope

This Policy forms a statement of the principles that guide our daily operations and establishes how we expect management, employees, service providers, clients, visitors and Company representatives to act in accordance with the law and applicable Company policies, procedures and guidelines.

This Policy does not discriminate at any level and applies **equally to all** persons who have an association with the Company. The principal objectives of this Policy are:

- Employees may smoke outside in designated areas during their breaks.
- The use of electronic cigarettes is prohibited wherever smoking is prohibited.
- The Company doesn't facilitate additional breaks for smoking.
- When smoking, do not leave cigarette butts or other traces of litter or tobacco on the ground or anywhere else.
- Designated smoking areas are to be assigned at the discretion of the Master on board Company managed vessels.
- On vessels not equipped with a purpose-designed smoking room, designated smoking areas shall be assigned.
- At shore-based offices, smoking is only permitted outside of buildings, in safe designated areas during breaks and as assigned by senior management.
- "No Smoking" signs shall be posted as deemed necessary.
- There is **strictly no** smoking on deck if the vessel is working within the 500 meters safety zone of an installation and wherever there is any other recognised risk or fire, explosion or any other form of combustion.

Responsibility

Company management and Masters are responsible for ensuring that the standards set forth by this Policy and documented guidelines and procedures are communicated to all employees and that their own conduct sets a good example in this respect.

Violations

All employees have a personal responsibility in ensuring their personal compliance and in ensuring that all those who enter Company premises are made aware of the policy. Those who do not comply with the smoke-free law may be liable for disciplinary action or criminal prosecution.

Continuous Improvement

This Policy is subject to annual review in light of changing legal requirements, stakeholder's expectations and Company operations. This Policy was approved by the Managing Partner on 22.05.2021.