



POLSKIE RATOWNICTWO OKRETOWE

QHSE MANAGEMENT SYSTEM

PART I

QHSE MANAGEMENT MANUAL

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QHSE MANAGEMENT SYSTEM

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QHSE MANAGEMENT SYSTEM

Chapter I

Quality (ISO 9001), health protection (HSE), safety, environment protection (ISM-CODE), vessel's security (ISPS-CODE)

QHSE POLICY

This policy describes the principles governing how the ship operating Company Polskie Ratownictwo Okretowe sp. z o.o. conducts business and how employees conduct themselves in support of the safety, health, environmental and quality policy. This policy applies to all Company businesses, employees and facilities worldwide. The Company commitment is to satisfy fully and exceed the expectations of our clients by setting and exceeding the highest standards possible for the provision of shipping and crane services for the shipping offshore industry, offshore installations services, ocean towage, transshipment and transport of goods in a safe manner and with health and environmental responsibility.

KEY PRINCIPLES

- Effective communication of this policy to all Company staff, our clients, contractors and subcontractors
- Ensure the proper organisational structure and highly qualified seagoing and shore-based staff
- Operate the fleet and maintain all the units and equipment according to the Company and our clients requirements with respect to supervising institutions
- Design and operation facilities in a manner that ensures health & safety of employees, and protects the environment and the public
- Ensure supervision of Energy Efficiency
- **Ensure supervision of Cyber Risk Management**
- Continual improvement in the quality, environmental, health and safety performance with the ultimate goal of zero complaints, zero injuries, zero incidents, zero failures, zero drugs & alcohol, zero emissions of toxic or hazardous substances, zero spills and intervention
- Benchmarking safety, environmental and management practices against other organisations and industry information sources as an integral part of the improvement process
- Managers accountability for achieving all objectives established for them
- Conduct necessary trainings to ensure support from management, allowing all parties involved to perform their duties according to the rules of this policy and to act in the emergency situations
- Ensure supervision of Anticorruption policy
- Conducting an annual management review to monitor the overall effectiveness and suitability of integrated Management System, including this policy, establishing and reviewing of objectives, and agreeing appropriate changes with management.
- Ensure supervision and certification of integrated Management System which meets all requirements of the ISM Code with respect to the ISPS Code, MLC 2006 and ISO 9001.

The QHSE Policy will be implemented through the systematic application of good sea and engineering practice with effective management to all activities, together with the active involvement and conscious improvement of all Company staff, contractors and subcontractors.

CHIEF EXECUTIVE OFFICER

Tadeusz Hatalski

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Chapter II

Definitions of terms and abbreviations in use

Term	Definition
ISM Code	The International Safety Management Code for the Safe Operation of Ships and for Pollution Prevention
ISPS Code	The International Ship and Port Facility Security Code
EN ISO 9001:2015	European Norm of Quality Standards
MLC 2006	Maritime Labour Convention 2006
Ship Operator/ Company	Ship owner or any organisation or person (such as manager or charterer) that has assumed responsibility for the vessel's operation from the ship owner, and that, having assumed this responsibility, agreed to assume all duties and full range of responsibilities
Administration:	Government of the state the flag of which the ship is entitled to fly.
QHSE Management System (QHSEMS)	Organisational structure and documented system allowing the ship operator's personnel effective implementing of safety and environment protection, quality and health policy
Document of Compliance (DOC)	Document issued to the ship operator that meets the requirements of the ISM Code
Safety Management Certificate (SMC)	Document issued for the vessel certifying that the ship operator and the vessel's management appointed by it act according to the approved QHSE Management System
Objective evidence	Qualitative or quantitative information, record or statement connected with safety that are based on observations, measurements or examination and that can be verified
Observation	Statement of fact made during safety management audit and substantiated with objective evidence
Non-conformity	Statement of irregularity connected with objective evidence indicating non-fulfilment of specified requirements
Major Non- conformity	Irregularity which constitutes major threat for safety at sea or people or marine environment safety that requires immediate conduct of corrective actions. Lack of effective and systematic implementation of the above Code is also considered as major non-conformity
Anniversary Date	Day and month of each successive year corresponding to the expiry date of a particular document or certificate
QHSE Policy	Company policy within quality (ISO 9001), health protection (HSE), safety, environment protection (ISM-CODE), vessel's security (ISPS-CODE)

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QHSE MANAGEMENT SYSTEM

Chapter III

Profile, context of the Company, interested parties and structure of the QHSE Management System

Company name „POLSKIE RATOWNICTWO OKRETOWE” used in the QHSE MS is the equivalent of „POLSKIE RATOWNICTWO OKRETOWE sp. z o.o.”

Registered office:

ul. Miodowa 26
81-558 Gdynia
Poland

Contact:

Phone: +48 58 661 18 15
e-mail: biuro@progdynia.pl
www.progdynia.pl

Polskie Ratownictwo Okretowe conducts activity in the following areas:

- maritime transport
- offshore installations services
- towage
- ship management
- transshipment and transport of goods
- salvage

Polskie Ratownictwo Okretowe is the leading shipping company in Poland, operating modern, specialized AHTS vessels – Anchor Handling Tug Supply and one of the largest on Baltic Sea floating crane 330 tons capacity. For over 60 years, we provide long-distance and oceangoing towing services for various objects. For over 20 years we build our position on the international offshore markets, providing services for gas and oil platforms installations. Operating the modern fleet we are specialized in platforms positioning, transport of goods and personnel, project cargo barges support, providing services for gas and oil terminals and tankers.

The floating crane MAJA provides services of transshipment up to 330 tons in all ports of the Baltic Sea. We also offer our crane rental for heavy cargo maritime transport on the deck between the ports of Baltic Sea.

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Ensuring the highest standards of quality and safety we are successfully working for major offshore, gas and fuel, research companies and concerns such as Saipem, ENI, Chevron, Lotos, Lundin, Polarcus, shipbuilding companies and many others. Our experience, knowledge and professionalism are confirmed by ISO and ISM Certificates.

Interested parties	Needs and expectations
Shareholders	Development of the Company in line with the strategy plans and with respect to legal requirements.
Clients Customers	Timely, safely and high quality performance of services with respect to contract and legal requirements.
Subcontractors Suppliers	Company satisfaction and no complaints of services and supplies with respect to contract, orders and legal requirements.
Authorities Recognized Organizations	Compliance with legal requirements.
Employees	Safe work environment with respect to employment agreements and legal requirements.

The QHSE Management System implemented in the Company is based on recommendations contained in the International Safety Management Code (IMO Resolution 741/18, ISM Code) and ISO 9001:2015. The working language is **English**. QHSE Management System in Polskie Ratownictwo Okrętowe consists of two parts:

PART I - QHSE Management Manual

PART II - Procedures, instructions and check lists

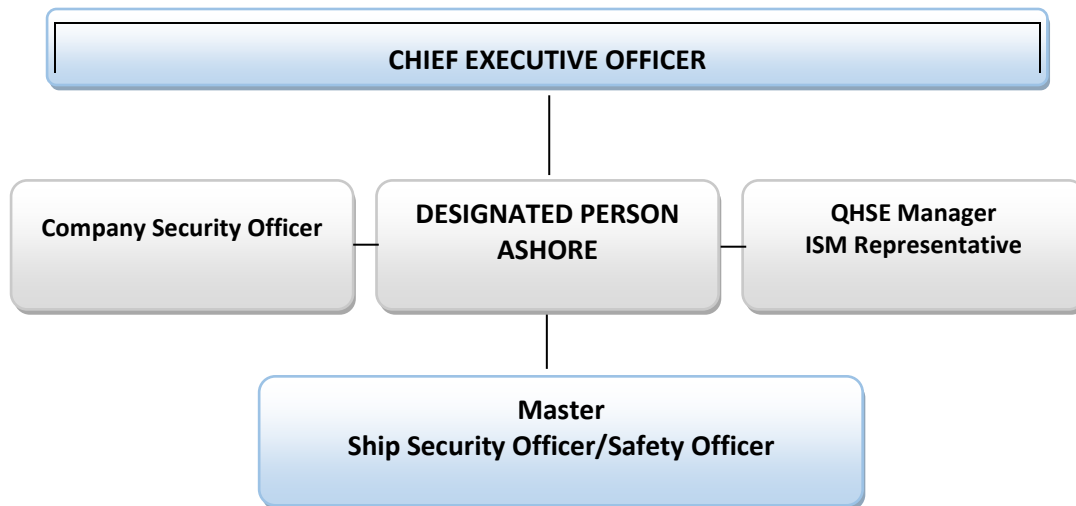
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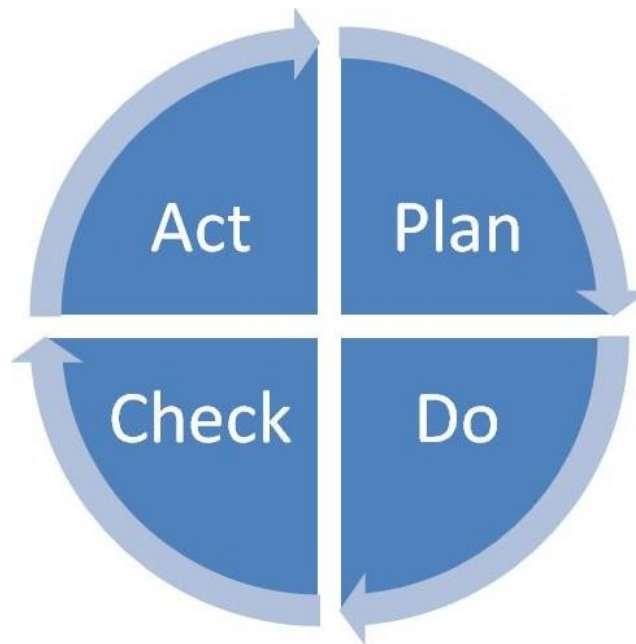
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QHSE MANAGEMENT SYSTEM

QHSE MANAGEMENT SYSTEM SAFETY COMMUNICATION STRUCTURE



QHSE MANAGEMENT SYSTEM CONTINUAL IMPROVEMENT



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PDCA:

Plan - recognize an opportunity and risks and plan a change within Risk Assessment process.

Do - implant what planned and assessed.

Check - monitor and review, analyze the results and identify what you've learned.

Act - take action based on what you learned for continual improvement.

To ensure the organization and business to be set up to consistently create value for our customers this seven quality management principles are to be followed:

1. Customer focus. Meeting – and exceeding – customer needs is the primary focus of quality management and contributes to the long-term success of the Company. It is important to not only attract but also retain the confidence of Company customers, so adapting to their future needs is key.

2. Leadership. Having a unified direction and mission that comes from strong leadership is essential to ensure that everyone in the organization understands what is to be achieved.

3. Engagement of people. Creating value for the Company customers by ensuring competent, empowered and engaged people at all levels of the Company business and organization.

4. Process approach. Understanding activities as processes that link together and function as a system to achieve more consistent and predictable results. People, teams and processes - everyone is familiar with the organization's activities and how they fit together to ultimately improve efficiency.

5. Improvement. Successful organizations have an ongoing focus on improvement. Reacting to changes in the internal and external environment is necessary to continue to deliver value for our customers.

6. Evidence-based decision making. Making decisions is never easy and naturally involves a degree of uncertainty, but ensuring decisions based on the analysis and evaluation of data improves the desired result.

7. Relationship management. Identifying the important relationships with interested parties such as clients, subcontractors and suppliers sustained the Company success.

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Leading and Lagging QHSE indicators with KPI's are the integral part of QHSE Management System.

CHAPTER IV

Designated Person Ashore, QHSE Manager, ISPS Security Officer, Operator's Safety Committee, Ship's Safety Committee, Post-accident Committee, Post-failure Committee

Designated Person Ashore (DPA)

TOMAS KUJAL

Chief Marine Superintendent

Mobile phone: +48 609 810 080

e-mail: tomas.kujal@progdynia.pl

When absent, substituted by:

ROBERT ORŁOWSKI

Chief Chartering Expert

Mobile phone: +48 601 63 00 48

e-mail: robert.orlowski@progdynia.pl

QHSE Manager (ISM Representative)

MONIKA LISATOWICZ

Mobile phone: +48 609 266 622

e-mail: monika.lisatowicz@progdynia.pl

When absent, substituted by:

RAFAŁ ŚWIERSZCZ

HR Manager

Mobile phone: +48 605 289 876

e-mail: rafal.swierszcz@progdynia.pl

ISPS Security Officer

RAFAŁ ŚWIERSZCZ

HR Manager

Mobile phone: +48 605 289 876

e-mail: rafal.swierszcz@progdynia.pl

When absent, substituted by:

MONIKA LISATOWICZ

QHSE Manager

Mobile phone: +48 609 266 622

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e-mail: monika.lisatowicz@progdynia.pl

Operator's Safety Committee

Chief Executive Officer (CEO)
Designated Person Ashore (DPA)
Fleet Technical Manager
Chief Marine Superintendent
QHSE Manager
Company Security Officer
HR Manager
Chartering Manager

Ship's Safety Committee

Master
Chief Officer
Ship's Security Officer/Safety Officer
Chief Engineer

Post-failure Committee

Fleet Technical Manager
Chartering Manager
Chief Marine Superintendent

Post-accident Committee

HR Manager
QHSE Manager

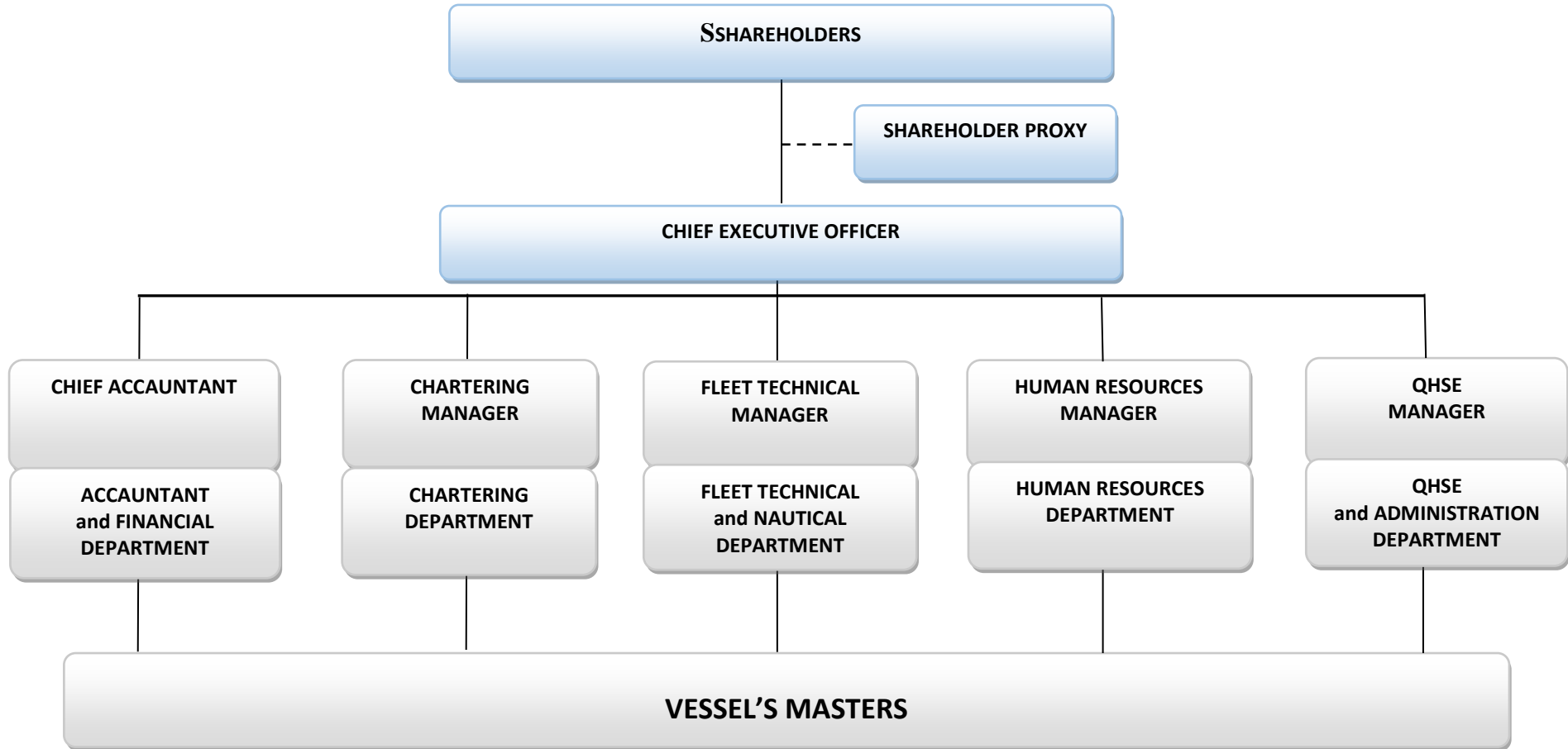
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ORGANIZATIONAL STRUCTURE



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Chapter V

Ship Operator's authority and responsibilities

Chief Executive Officer (CEO) is responsible for the Company QHSE policy and for effective implementation and functioning of the QHSE Management System at all organisational levels, both on shore and on board vessels. CEO defines responsibilities, authority and mutual relations among all employees that manage, perform and verify work having impact on safety and pollution prevention. CEO is responsible for ensuring appropriate measures and organisational support from shore, allowing people involved in QHSE Management System (including DPA) fulfilling their duties. CEO supervises the qualified employees by establishing procedures, plans and instructions on key tasks within the personnel and vessel's safety, health, environment protection with high quality standards. CEO is responsible for the periodic appraisal of the QHSE Management System effectiveness and ensures that the QHSE MS complies with the relevant codes, directives, norms and standards that are recommended by IMO, administration, classification societies and organisations connected with shipping.

DESIGNATED PERSON ASHORE is responsible for ensuring support and maintenance of operational contact between the vessels and the Operator's office. He has the direct access to the CEO. He monitors safety and pollution prevention status during the operation of every vessel and also ensures that necessary measures and organisational support from shore can be used appropriately to the existing needs. In the case of an emergency he calls the Operator's Safety Committee.

QHSE Manager/ISM Code Representative is responsible for the implementation of the QHSE Management System, its maintenance, availability and documentation archives. QHSE Manager is responsible for planning and conducting audits on shore and on board and also for monitoring the corrective actions have been implemented. QHSE Manager ensures that the employees working on vessels obtain proper information on QHSE in the working language or in languages that are understood by them.

DETAILED SCOPE OF RESPONSIBILITIES, DUTIES AND ENTITLEMENTS/AUTHORITIES ARE DESCRIBED IN:

1. PART II OF THE QHSE MANAGEMENT SYSTEM, IN PARTICULAR PROCEDURES,
2. ORGANIZATIONAL RULES AND INDIVIDUAL SCOPE OF OPERATIONS

particular names in Polish: Regulamin Organizacyjny, zakresy czynności.

3. COMPANY COLLECTIVE AGREEMENTS

particular names in Polish: Zakładowy Układ Zbiorowy Pracy dla pracowników administracji, Zakładowy Układ Zbiorowy Pracy dla pracowników dźwigu pływającego MAJA, Porozumienie w sprawie zasad pracy i wynagradzania oficerów i marynarzy i kucharzy zatrudnianych przez MRT Shipping Ltd na statkach, których operatorem jest Polskie Ratownictwo Okretowe

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Chapter VI

Master's authority and responsibilities — the ship's crew

MASTER'S AUTHORITY

1. He holds an overriding authority and shall be responsible for making decisions with respect to safety, environment pollution prevention and health protection.
2. He is authorised to issue orders and instructions in a way that is understood and simple to ensure safety of the vessel's crew, any third parties, entrusted property and environment protection.
3. In special situations he has the right to withdraw from the documented and accepted procedures of safe conduct.
4. He is the only person who manages the ship, superior over all crew members and the Operator's representative towards the crew and third parties.
5. He has the right to request assistance from the Operator in every case when such assistance is necessary or there are any doubts concerning safety, environment and health protection.

MASTER'S RESPONSIBILITY

1. He is responsible for the performance of the Operator's policy, environment and health protection and also for motivating the crew to comply with the policy.
2. He is responsible for observing and applying the rules of safety, environment and health protection established within the Company and for assessing whether they are known, applied and observed by the crew members.
3. He is responsible for the periodic review of the Safety Management System on board a vessel and he is obliged to report all the non-conformities to the management on shore, in a written form.
4. He is the only person responsible for correct functioning and safety of the vessel and the entrusted property, and also the crew, passengers and marine environment protection.
5. He is obliged to control the validity of the vessel and crew's required documents and certificates.
6. He is responsible for controlling the vessel's technical efficiency, her equipment and specialist appliances.
7. He is obliged to immediately inform the Operator about all the irregularities and events that may cause threat to safety of the vessel, personnel and environment.

The Company ensures to man the vessels with qualified personnel holding necessary certificates and enjoy proper health conditions pursuant to international and flag state requirements and certified by appropriate documents and certificates. The Company ensures the Master and the crew an opportunity to get acquainted with their duties in the area of quality, safety, health and environment protection.

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Chapter VII

Certification and periodic verification

The Company has conducted the certification process and has obtained Safety and Management Certificates and MLC Certificates for all the operated vessels and also the Documents of Compliance and ISO 9001 in the Operator's office.

The scope of ISO 9001 Certification:

SHIP OPERATING COMPANY PROVIDING SHIPPING AND CRANE SERVICES FOR THE SHIPPING AND OFFSHORE INDUSTRY, IN PARTICULAR OCEAN TOWAGE, TRANSHIPMENT AND TRANSPORT OF GOODS.

During the certification process it was confirmed that the QHSE Management System complies with the ISM Code and ISO 9001 requirements and functions effectively. It was stated that the Operator and the vessel's management act according to the implemented QHSE Management System.

For the purpose of the periodic verification, the Company conducts intermediate or annual audits, and in case of renewing the validity of the Document of Compliance, ISO 9001 Certificate, Safety Management Certificate, the renewal audit is conducted.

In case of finding a major non-conformity at the Operator's office or on board a vessel during the certification, intermediate or renewal audits, the Operator will conduct an additional audit before issuing or confirming the validity of the Compliance Document, ISO 9001 Certificate or Safety Management Certificate.

All verifications are conducted according to relevant procedures, including the directives and requirements of the ISM Code. The QHSE Management System comply also with ISO 9001 and MLC 2006 requirements.

**The original Document of Compliance (DOC) as the evidence
that the Company is capable to satisfy the ISM Code requirements,
and the original ISO 9001 Certificate as the evidence
that the Company is capable to satisfy the ISO 9001 requirements
are kept by the QHSE Manager.**

Copies of the Document of Compliance can be found on each vessel.

**The original Safety Management Certificate (SMC) and MLC Certificate
are kept together with other certificates on each vessel,
and copies are kept by the QHSE Manager.**

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Chapter VIII

List of the main legal instruments regulating Company's policy in the scope of quality, safety, environment protection, vessel's safety and health protection.

1. The International Regulations for Preventing Collisions at Sea - COLREG (unified text of the annexe for the COLREG Convention – 1972, with subsequent amendments).
2. The International Convention for the Prevention of Pollution From Ship – MARPOL – 1973/78.
3. International Convention for the Safety of Life at Sea, 1974 SOLAS.
4. International Convention on Load Lines, 1966, as modified according to the 1988 protocol.
5. International Ballast Water Management (BWM) Convention, 2004.
6. International Convention on Standards of Training, Certification and Watchkeeping - STCW 1978/1995
7. The International Safety Management Code for the Safe Operation of Ships and for Pollution Prevention (ISM Code).
8. International Life Saving Appliances Code.
9. Code of Safe Practice for Cargo Stowage and Securing (CSS Code).
10. International Fire Safety System Code (FSS Code).
11. Intact Stability Code for all types of vessels provided in the IMO documents.
12. The International Ship and Port Facility Security Code (ISPS Code).
13. The Polish Maritime Code.
14. The flag state regulations.
15. Maritime Labour Convention MLC 2006.
16. ISO 9001 - indicates ISO 9001:2015.

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Chapter IX

List of the QHSE Management System documentation

Procedure/ document symbol	Title of procedure/document	Person responsible for preparing the content and amendments
SMM	QHSE MANAGEMENT MANUAL	QHSE Manager
P-01	FORM OF THE QHSE MANAGEMENT SYSTEM PROCEDURE	QHSE Manager
P-02	QHSE DOCUMENTATION SUPERVISION	QHSE Manager
P-03	COMMUNICATION	QHSE Manager
P-04	HUMAN RESOURCES	HR Manager QHSE Manager
P-05	DRUGS AND ALCOHOL AND SMOKING	HR Manager
P-06	SHIP'S OPERATIONS	Fleet Technical Manager* Chief Marine Superintendent*
P-07	PREVENTION OF POLLUTION FROM SHIPS ENVIRONMENTAL MANAGEMEN	Chief Marine Superintendent*
P-08	VESSEL INSPECTIONS	Fleet Technical Manager* Chief Marine Superintendent*
P-09	SERVICES, INSPECTIONS, REPAIRS AND DOCKING	Fleet Technical Manager* Chief Marine Superintendent*
P-10	ORDERS AND SUPPLIES	Fleet Technical Manager* Chief Marine Superintendent*
P-11	TOWAGE	Chartering Manager
P-12	OFFSHORE OPERATIONS	Chartering Manager
P-13	LIFTING OPERATIONS	Chief Chartering Expert
P-14	INCIDENT, NEAR MISS, INJURY, NCCAPA, IMPROVEMENT SUGGESTION AND POSITIVE REPORTING	QHSE Manager
P-15	DANGEROUS WORK PERMITS LOCKOUT TAGOUT	QHSE Manager

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P-16	POST-ACCIDENT POST-FAILURE PROCEEDING, REPORTING SEE ACCIDENTS	Fleet Technical Manager* QHSE Manager
P-17	EMERGENCY RESPONSE PLAN	Fleet Technical Manager*
P-18	SAFETY COMMITTEES	QHSE Manager
P-19	OPERATOR'S INSPECTIONS	Fleet Technical Manager*
P-20	INTERNAL AUDIT EXTERNAL AUDIT	QHSE Manager
P-21	CORRECTIVE AND PREVENTIVE ACTIONS	QHSE Manager
P-22	RISK ASSESSMENT	QHSE Manager
P-23	FOOD, CATERING, ACCOMMODATION AND HYGIENE	QHSE Manager
P-24	MEDICAL CARE	QHSE Manager
P-25	SEAFARERS COMPLAINT PROCEDURE	QHSE Manager
P-26	CUSTOMERS AND SUBCONTRACTORS CLAIMS AND COMPLAINTS	Chartering Manager
P-27	PERSONAL PROTECTIVE EQUIPMENT	QHSE Manager
P-28	CUSTOMER SATISFACTION SURVEY	Chief Chartering Expert
P-29	MANAGEMENT OF CHANGE PROCEDURE	Chief Marine Superintendent*
P-30	CYBER RISK MANAGEMENT PROCEDURE	Chief Marine Superintendent QHSE Manager

***In all above listed procedures:**

- Fleet Technical Manager takes over duties/replaces Chief Superintendent, Senior Superintendent
- Chief Marine Superintendent takes over duties/replaces Marine Superintendent
- Fleet Technical and Nautical Department takes over duties/replaces Fleet Technical Department

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