

Health, Safety, Security & Environmental Policy

Silver Fern Shipping Ltd (SFSL) is committed to conducting all phases of its business operations in a manner that complies with its legal obligations in respect of promoting a healthy, safe and secure working environment, being environmentally responsible and compliant with all relevant rules and regulations in order to minimise the impact of its operations on Health, Safety, Security & Environment (HSSE).

This will be achieved through the implementation of a fully documented Integrated Management System (IMS) which satisfies the requirements and elements of the current standards of ISO 9001 & 14001 and OHSAS 18001 and the ISM and ISPS Codes.

The key to a successful IMS is the involvement and commitment of our employees and contractors. All employees and contractors are obliged to comply with their own obligations under HSSE legislation and regulations and to take steps within their power and responsibility to seek to ensure SFSL complies with its obligations under HSSE legislation and regulations. This commitment requires a thorough understanding of the HSSE aspects of each task that we perform.

SFSL is committed to complying with its legal obligations in respect of:

- The prevention of injury and ill health;
- Zero spills to the environment;
- Identifying, controlling and eliminating HSSE risks along with any legal and other requirements;
- Encouraging open communication amongst all SFSL employees, clients, suppliers, contractors and regulators, regarding our IMS standards, procedures and performance;
- Conducting a periodical internal review process through auditing to demonstrate continuous improvement in the company's HSSE performance;
- Provision of Goals and Objectives and Key Performance Indicators;
- Senior Management shall provide the appropriate training and the provision of resources for the implementation of our IMS procedures which will result in a reciprocal commitment from our employees and contractors;
- Conducting our operations, in a manner that safeguards the natural environment and the health and safety of our employees and contractors;
- Maintaining and sustaining a full emergency response capability;
- Diligently striving to monitor and continuously improve the effectiveness of our IMS; and
- Clearly identify the relevant HSSE representatives both seagoing and ashore, such that they can fulfil their duties in accordance with the ISM Code, ISPS Code, ISO 9001 & 14001, OHSAS 18001, Flag State Regulations and Maritime Legislation.

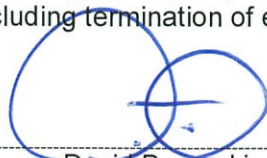
Any hazardous condition, security breach, unsafe practice/procedure and any inappropriate behaviour shall be immediately reported to the line Manager. Senior Management shall take prompt action to correct the identified issue or condition and take the appropriate steps to prevent any reoccurrence. Employees and contractors are encouraged to continually improve our IMS. The reporting procedures combined with periodical audits, will promote continuous improvement in our HSSE processes and performance.

SFSL expects its employees and contractors to take responsibility, a leading role in the promotion of a healthy wellbeing, a commitment to a safe & secure working environment, the protection of the marine environment, along with conservation of energy, to protect the vessel from any unlawful act, to safe guard themselves and to ensure that their actions, either by example, behaviour or instructions, do not put others or property at risk. All employees and contractors shall co-operate fully in adhering to this policy and all relevant procedures. Contravention of this Policy may result in disciplinary action including termination of employment.

Authorised By:



Robert Walker
Group Chief Operating
Officer



David Borcoski
Group Managing Director & CEO



Adrian Whatley
Group Commercial and
Finance Director



Quality Policy

Silver Fern Shipping Ltd (SFSL) is committed to conducting its business activities in such a way as to achieve the highest quality in operations and services. This will be achieved through the implementation of a fully documented integrated management system that satisfies the requirements of the current standards of:

- ISO 9001; and
- the International Safety Management Code.

Compliance with the requirements of the Integrated Management System is mandatory for all employees. All employees are responsible for the quality of service supplied to our customers and for ensuring that their commitment to quality is fully realised so as meet customer and applicable statutory and regulatory requirements.

Quality will be achieved through conscious effort from all members of staff to continually improve the service level to our customer and compliance to our system and enhance customer satisfaction.

All employees are authorised to initiate action, identify and record problems, recommend and implement solutions, to ensure non-conformance are corrected and prevented. This will be achieved through job safety analysis, risk assessments, safety surveys, safety opportunity recording, safety rounds and workplace inspections, and will be recorded using the procedure change request process.

SFSL will actively encourage the adoption of high quality principles in line with ISO 9001 by its suppliers and, where necessary, require improvement in practices to align them with those of SFSL.

Authorised By:



Robert Walker
Group Chief Operating
Officer



David Borcoski
Group Managing Director & CEO



Adrian Whatley
Group Commercial and
Finance Director



Business Conduct & Ethics Policy


The Board of Directors of Silver Fern Shipping Ltd (**SFSL**) hereby confirms its adherence to the requirements of sound business practices and a commitment to the following principles of business conduct and ethics. SFSL acknowledges that both it and its customers are carrying on business with a view to profit and, in this regard, SFSL requires that all its employees, officers and representatives take steps to ensure that SFSL:

- provides services in compliance with its Integrated Management System;
- does not accept business for which it does not have the necessary capability and resources;
- allocates its resources so as to render equitable and lawful performance to each of our customers;
- advises the customer of any conflict of interest in accordance with all relevant provisions of the Management Agreements;
- complies with obligations of confidentiality including in respect of each customer's business and activities;
- complies with its obligations in relation to safety, protection of the marine environment and to the safeguarding of our customer's property;
- whenever practicable, advises the customer of any potentially dangerous or other unacceptable situations;
- observes standards of ethical conduct and complies fully with all applicable laws and regulations, including anti-bribery legislation, in every jurisdiction in which SFSL does business;
- avoids situations where personal interests could conflict with, or even appear to conflict with, the interests of the Company;
- promotes a healthy working environment including, but not limited to, the provision of safeguards against drug and alcohol abuse;
- always conforms with internationally accepted standards and the requirements of our customer;
- does not knowingly participate, practice, commit to or continue to carry out business for customers when the service to be provided may be used in the furtherance of illegal activities to its actual knowledge;
- at all times adhere to sound business principles with respect to the management of funds and cash;
- abides by applicable privacy legislation and regulations; and
- does not commit to, or continue to serve, a customer who displays a lack of commitment to Maritime Legislation.


Authorised By:



Robert Walker
Group Chief Operating
Officer



David Borcoski
Group Managing Director & CEO



Adrian Whatley
Group Commercial and
Finance Director



Code of Conduct

Silver Fern Shipping Ltd (SFSL) is committed to achieving outstanding performance and results to provide value to our stakeholders, while considering the interests of our employees, clients, the community and others, with whom we do business.

In striving for outstanding performance and results, we shall not compromise our ethics or principles as SFSL places great importance on honesty, integrity, quality and trust.

To emphasise the importance of the Code of Conduct and the potential seriousness of any breach of this code any employee maybe subject to disciplinary action including dismissal, if found to be in breach of this Code.

SFSL has a number of documented policies and procedures which set out specific legal, ethical, health & safety requirements and expectations. These include policies on Health, Safety, Security & Environment, Discrimination, Sexual Harassment, Bullying, Equal Opportunity, Quality and Drug & Alcohol.

No matter what your role is at SFSL or your place of work, you are required to adhere to our policies, procedures and our Code of Conduct by complying with the following key obligations:

- Acting in SFSL's best interests at all times;
- Upholding SFSL's reputation and not doing anything that may bring SFSL into disrepute or otherwise adversely affect SFSL;
- Acting with honesty and integrity and complying with all lawful directions of SFSL;
- Honestly, faithfully and diligently performing your duties and responsibilities;
- Treating each other with respect, valuing difference and maintaining a healthy working environment;
- Not permitting personal interests to conflict with the interests of SFSL and immediately disclosing to SFSL any conflict or potential conflict of interests;
- Maintaining privacy and confidentiality;
- Encouraging continuous improvement and innovation;
- Complying with any legal and other requirements;
- Taking steps to ensure zero injury to our employees and zero harm to the environment from our operations.

Maintaining a high standard of corporate conduct is very important to SFSL's credibility and reputation. Employees are required to report any actual or suspected breach of this Code or policies to their Manager/Supervisor/Officer. Alternatively, employees may choose to contact their General Manager, Contact Officer or Designated Person.

Any employee, who reports, in good faith, a breach or suspected breach of a legal, ethical or safety standard, can do so confidentially and will not be subject to retaliation or suffer any recrimination for making that report.

Authorised By:



Robert Walker
Group Chief Operating
Officer



David Borcoski
Group Managing Director & CEO



Adrian Whatley
Group Commercial and
Finance Director



Privacy Policy

Silver Fern Shipping Ltd (SFSL) is committed to ensuring that we handle private information about individuals in accordance with applicable legal obligations. It is important to SFSL that individuals dealing with us are confident that we respect their personal information and do not interfere with their privacy when handling this information.

SFSL abides by the Privacy Principles under the relevant Privacy Act. This Policy is not intended to affect SFSL's rights in relation to collection and handling of employee records.

Collection of Information

SFSL only seeks to collect personal information about employees and non-employees necessary for the operations of SFSL. Typically this includes a person's name, address, date of birth, gender, salary, tax file number, employment history, claims history, health information and any other required information. This information is held in a format that identifies the person. SFSL usually collects this information either from the employee or direct from the person concerned in the case of non-employees. SFSL may also collect financial and personal details relevant to the services provided to you by SFSL or the services you provide SFSL.

SFSL will at all times endeavour to collect personal information directly from the individual to whom the information relates. However, in certain situations it may not be possible to do this and as such SFSL may collect information about you from third parties. If this occurs SFSL will take all reasonable steps to ensure that these parties collect personal information in accordance with their responsibilities under the Act.

Use and Disclosure of Personal Information

Personal information will only be used or disclosed for the purpose for which it was collected (or for a permitted secondary purpose). In the ordinary course of business, SFSL may need to pass information to other organisations, such as:

- The person's Superannuation Fund, Trustee and Administrators;
- Insurance brokers and/or insurers;
- Government bodies, regulatory or other agencies to whom SFSL is required to disclose personal information by law;
- SFSL's legal and other professional advisers; and
- Document storage, printing and collating companies.

SFSL is also bound by obligations of confidentiality. We do not sell or rent out any of the information we hold on personnel and protect the security of that information in accordance with regulatory requirements and industry practice.

Accessing Personal Information

Any person can access his or her own personal information by contacting the Company's Contact Officer. If the information held by SFSL is inaccurate, incomplete or not up-to-date, a person may request SFSL to correct the information, but only as it relates directly to the person making the request.

There are some circumstances in which SFSL is entitled to deny access to information. These include circumstances where such information is used in confidential decisions or in a commercially sensitive decision-making process, where the privacy of others may be breached if the information was accessed or where the law requires or authorises such access, to be denied. The Company's Contact Officer will advise if any of these circumstances apply.

If anyone is concerned about a possible interference with privacy, they should contact the Company's Designated Person.

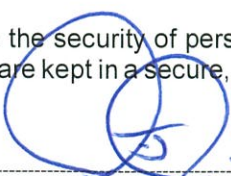
Security

SFSL takes appropriate measures to ensure the security of personal information and to protect it against unauthorised access, misuse or loss by ensuring such files are kept in a secure, lockable filing cabinet and any computer system through a password protected system.

Authorised By:



Robert Walker
Group Chief Operating
Officer


David Borcoski
Group Managing Director & CEO

Adrian Whatley
Group Commercial and
Finance Director



Drug & Alcohol Policy (Seagoing)

Silver Fern Shipping Ltd (SFSL) is committed to the health, safety and wellbeing of all employees. Any persons under the influence of alcohol and/or prohibited substances, represent a hazard to their own health, safety, the safety of fellow crewmembers, the vessel, its cargo and the environment.

Drugs

It is SFSL's policy that all persons shall not use prohibited substances or inappropriately consume prescription medication under any circumstances.

Drugs have the ability to affect human behaviour, hinder a person's ability to work and lead to physical and mental deterioration.

The manufacture, distribution, carriage, selling and possession of any drugs other than regular prescription or over the counter drugs is strictly prohibited.

Prescription drugs may only be used on board a vessel with a legal prescription from a registered doctor and/or under authorised issue from the vessel's medical locker. In all cases the Master is to be notified of such usage.

Drug intoxication will not be tolerated at any time.

Alcohol

It is SFSL's policy that all employees comply with the alcohol policy as it applies to that specific vessel.

Issuance of alcohol is under the direct control and authority of the Master. No other alcohol may be brought, consumed or carried on board.

Alcohol intoxication will not be tolerated at any time.

SFSL's Alcohol Policy for all vessels is in accordance with OCIMF Guidelines for Control of Alcohol on Board Ship and is 0.00% Blood Alcohol Concentration (BAC) while on duty and 0.04 grams per 100 millilitres of blood (0.04% BAC) whilst off duty. Terminal or local regulations more stringent to the above will take precedence in case the vessel calls at such ports or terminals.

Drug and Alcohol Testing

SFSL employees including shore based representatives, supernumeraries, contractors and visitors may be subject to random drug and alcohol testing. Personnel testing positive or refusing to undergo the applicable testing, may be subject to removal from the vessel and subsequent termination of employment.

Company Assistance

SFSL is committed to the health and welfare of all employees and the promotion of a safe and healthy lifestyle. Personnel who feel they may have a drug and/or consumption related issues, are encouraged to indicate this to the Company. SFSL will provide confidential assistance and support to employees where required or requested, in relation to drug and/or alcohol consumption related issues.

Authorised By:



Robert Walker
Group Chief Operating
Officer



David Borcoski
Group Managing Director & CEO



Adrian Whatley
Group Commercial and
Finance Director



Drug & Alcohol Policy (Shore based)

Application of Policy

Silver Fern Shipping Ltd (SFSL) is committed to the health, safety and wellbeing of all employees and has legal obligations relating to the health and safety of employees and workplace participants.

This Policy applies to shore based employees but not onboard employees. Contravention of this Policy may result in disciplinary action including termination of employment.

In this Policy, the term "impaired by" means impaired by or under the influence of drugs or alcohol such that the employee is unable to safely carry out all of their duties and responsibilities or conducts themselves in such a manner as to expose SFSL to commercial or reputational damage or any workplace participant to risk.

SFSL reserves the right to require an employee to submit to drug and/or alcohol testing if it appears to SFSL that the employee is impaired by drugs and/or alcohol. Refusal to submit to testing may result in disciplinary action including termination of employment. Any employee impaired by drugs or alcohol may be safely removed from the workplace.

Where SFSL considers it appropriate, SFSL may provide confidential assistance and support to employees where required or requested, in relation to drug and/or alcohol consumption related issues.

Drugs

It is SFSL's policy that employees must not be impaired by prohibited drugs or prescription drugs used other than as directed whilst at work, when performing work duties, attending work related events or functions, whilst representing SFSL or otherwise during work hours.

Drugs have the ability to affect human behaviour and hinder a person's ability to work, and may lead to physical and mental deterioration.

The manufacture, distribution, carriage, selling or possession at work of any drugs (other than possession of prescription medication or over the counter drugs) is strictly prohibited.

Alcohol

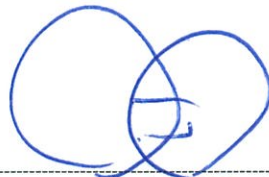
Except as set out above, it is SFSL's policy that employees must not be impaired by alcohol whilst at work, when performing work duties, attending work related events or functions, whilst representing SFSL or otherwise during work hours.

Moderate and responsible consumption of alcohol is permitted at appropriate work related events or functions. If returning to work after an event or function, employees must ensure they are not impaired by alcohol on return to work.

Authorised By:



Robert Walker
Group Chief Operating
Officer



David Borcoski
Group Managing Director & CEO



Robert Walker
Group Commercial and
Finance Director



Email, Internet & Communication Policy

Silver Fern Shipping Ltd (SFSL) is committed to ensuring that all information, which is communicated or accessed, on the world wide web, intranet or via e-mail, contributes to enhancing the level of communication and information resources at SFSL. This Policy applies to all employees of SFSL. Employees may be subject to disciplinary action including termination of employment for contravention of this Policy.

Email & Internet

If employees are provided with internet and email access by SFSL, such access is to be used primarily for work related purposes. Limited personal use is acceptable provided it is not excessive, does not adversely affect SFSL or the employee's performance of their duties and responsibilities and otherwise complies with this Policy. SFSL may monitor employee use of SFSL's internet and email system and all emails are the property of SFSL.

Social Networking

When an SFSL employee is participating in social networking, they are representing both themselves personally and SFSL. SFSL believes social networking is a very valuable tool and continues to advocate the responsible involvement of all employees in this space. However, all use of Social Networking must comply with this Policy.

Use of Email, Internet & Social Networking

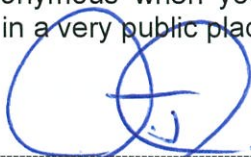
All usage of SFSL's email and internet system, and use of social media, must comply with the following:

- SFSL's internet system must not be used to access or download any material, and employees must not send or forward any email, that is pornographic, illegal, offensive or inappropriate;
- Employees must not use SFSL's internet system or send or forward any email to abuse, harass, intimidate or act unprofessionally towards any person, for personal gain or in any manner which conflicts with their duties and responsibilities or SFSL's interests;
- Employees must never represent themselves or SFSL without authority or in a false or misleading way. All statements must be true and not misleading; all claims must be substantiated;
- Employees must not post disparaging or disrespectful comments about fellow employees or any other person and never comment on anything related to a legal matter, litigation, or any parties SFSL may be involved with;
- No SFSL employee shall make or receive any contact from a media organisation through either personal contact or by company mobile, public telephone or any other multimedia devices;
- Never participate in a social media forum or any other form of telecommunication, when the topic being discussed may be considered a crisis or an emergency situation in relation to SFSL;
- Employees must not disclose confidential information of SFSL;
- Discrimination and any form of harassment applies to all electronic social media, in any other form of communication or conduct;
- Prior to any use of any SFSL branding or company logo on social media, approval must be sort from the SFSL Group Executive Management;
- If you have authority to post to personal networking sites about job related content or about the company, identify yourself as a SFSL employee and use a disclaimer to make it clear that these views are not reflective of the views of SFSL; and
- Be aware that you are not anonymous when you make online comments. Information on your networking profiles is published in a very public place.

Authorised By:



Robert Walker
Group Chief Operating
Officer



David Borcoski
Group Managing Director & CEO



Adrian Whatley
Group Commercial and
Finance Director

Sexual Harassment Policy

Application of Policy

Silver Fern Shipping Ltd (SFSL) recognises that everybody in the workplace has the right to be treated with respect and dignity. SFSL expressly prohibits sexual harassment at work. It is unacceptable and unlawful and may expose the perpetrator and SFSL to liability and every employee has a responsibility to ensure the workplace is free from sexual harassment.

This Policy applies to all employees of SFSL. Disciplinary action including termination of employment may be taken against anyone found to have engaged in conduct amounting to sexual harassment or who has otherwise breached this Policy. This Policy applies in conjunction with SFSL's Sexual Harassment Procedure which is available at in our Integrated Management System.

What is Sexual Harassment?

A person sexually harasses another if he or she makes an unwelcome sexual advance; makes a request for sexual favours; engages in any other unwelcomed conduct of a sexual nature; in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated. Examples of sexual harassment are set out in SFSL's Sexual Harassment Procedure.

Sexual harassment may occur in a single incident or a series of incidents. Sexual harassment may occur by way of conduct in the workplace that is not directed towards a particular person but which creates an uncomfortable culture or atmosphere in the workplace or which is seen or overheard by a person who is offended, humiliated or intimidated (e.g. sending emails or displaying pictures of a sexual nature). Sexual harassment may occur in the workplace or outside the workplace but in connection with work. Friendships and consensual relationships are not sexual harassment.

Victimisation and malicious complaints

A person must not victimise another person for making a complaint or being involved in a complaint (e.g. as a witness) of sexual harassment. A person must not make a complaint of sexual harassment against another person that is malicious, vexatious or knowingly false. Any person who does so may be subject to disciplinary action including termination of employment.

What can you do if you experience Sexual Harassment?

If you feel that you have been sexually harassed, you should not ignore it. Sexual harassment may occur from another employee or representative of SFSL, other workplace participants, or clients. You are not expected to put up with sexual harassment from any person. If you feel that you have been sexually harassed, please refer to SFSL's Sexual Harassment Procedure as to the applicable complaints process and the Contact Officer. You will not be subject to any detriment as a result of making a good faith complaint of sexual harassment.

Authorised By:



Robert Walker
Group Chief Operating
Officer



David Borcoski
Group Managing Director & CEO



Adrian Whatley
Group Commercial and
Finance Director



Bullying Policy

Application of Policy

Silver Fern Shipping Ltd (SFSL) recognises that everybody in the workplace has the right to be treated with respect and dignity. SFSL expressly prohibits bullying at work. It is unacceptable and unlawful and may expose the perpetrator and SFSL to liability and every employee has a responsibility to ensure the workplace is free from bullying.

Occupational health and safety legislation (OH&S legislation) imposes legal obligations on SFSL, its employees and contractors in relation to safety at work. Bullying creates an unsafe workplace and may amount to a breach of OH&S legislation and it is a criminal offence in some circumstances. Disciplinary action including termination of employment may be taken against anyone found to have engaged in conduct amounting to bullying or who has otherwise breached this Policy. This Policy applies in conjunction with SFSL's Bullying Procedure which is available in our Integrated Management System.

What is Bullying?

Bullying has been defined as repeated unreasonable behaviour directed towards a worker or group of workers that creates a risk to health and safety. Bullying includes behaviour that could be expected to intimidate, offend, degrade, humiliate undermine, isolate or threaten.

Bullying can be physical but can also be verbal or psychological. Conduct that creates a risk to a person's physical or mental health or safety may constitute bullying. Examples of bullying include physical assault or threats, insulting or teasing, and undermining or isolating another person. Further examples are set out in SFSL's Bullying Procedure.

Reasonable performance management and reasonable job requirements are not bullying. For example: Setting performance goals, standards and deadlines, counselling and warnings if requirements are not met constructive feedback, remedial measures to improve performance.

Victimisation and malicious complaints

A person must not victimise another person for making a complaint or being involved in a complaint (e.g. as a witness) of bullying. A person must not make a complaint of bullying against another person that is malicious, vexatious or knowingly false. Any person who does so may be subject to disciplinary action including termination of employment.

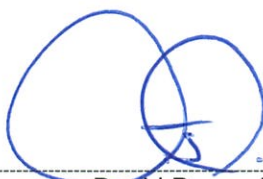
What can you do if you experience Bullying?

If you feel that you have been bullied, you should not ignore it. Bullying may occur from another employee or a representative of SFSL, another workplace participants or client. You are not expected to put up with bullying from any person. If you feel that you have been bullied, please refer to SFSL's Bullying Procedure as to the applicable complaints process and the Contact Officer. You will not be subject to any detriment as a result of making a good faith complaint of bullying.

Authorised By:



Robert Walker
Group Chief Operating
Officer



David Borcoski
Group Managing Director & CEO



Adrian Whatley
Group Commercial and
Finance Director



Equal Opportunity Policy

Application of Policy

Silver Fern Shipping Ltd (SFSL) recognises that everybody in the workplace has the right to be treated with respect and dignity. SFSL expressly prohibits discrimination at work. It is unacceptable and unlawful and may expose the perpetrator and SFSL to liability. Every employee has a responsibility to ensure the workplace is free from discrimination.

This Policy applies to all employees of SFSL. Disciplinary action including termination of employment may be taken against anyone found to have engaged in discrimination or who has otherwise breached this Policy. This Policy applies in conjunction with SFSL's Discrimination Procedure which is available in our Integrated Management System.

What is Discrimination?

It is unlawful and in breach of this Policy to discriminate against anyone in employment or in providing goods and services on the basis of any of the following attributes: Age; Breastfeeding; Employment activity; Gender identity; Physical or mental disability (including illness); Industrial activity; Lawful sexual activity; Marital status; Parental status or status as a carer; Physical features; Political belief or activity; Pregnancy; Race; Religious belief or activity; Sex; Sexual orientation; Irrelevant criminal record; or Personal association (as a relative or otherwise) with a person who is identified by any of the above attributes.

Discrimination can be direct or indirect. Direct discrimination occurs if a person treats or proposes to treat someone with an attribute less favourably because of that attribute. Examples of direct discrimination include making negative comments about a colleague's race or excluding or isolating an employee due to their religion. Further examples are set out in SFSL's Discrimination Procedure. Indirect discrimination occurs if a person imposes or proposes to impose a requirement, condition or practice that has or is likely to have the effect of disadvantaging persons with an attribute; and is not reasonable.

Victimisation and malicious complaints

A person must not victimise another person for making a complaint or being involved in a complaint (e.g. as a witness) of discrimination. A person must not make a complaint of discrimination against another person that is malicious, vexatious or knowingly false. Any person who does so may be subject to disciplinary action including termination of employment.

What can you do if you experience Discrimination?

If you feel that you have been discriminated against, you should not ignore it. Discrimination may occur from another employee, representative of SFSL, other workplace participants, or clients. You are not expected to put up with discrimination from any person. If you feel that you have been discriminated against, please refer to SFSL's Discrimination Procedure as to the applicable complaints process and the Contact Officer. You will not be subject to any detriment as a result of making a good faith complaint of discrimination.

Authorised By:



Robert Walker
Group Chief Operating
Officer



David Borcoski
Group Managing Director & CEO



Adrian Whatley
Group Commercial and
Finance Director



Cyber Security Policy

Application of Policy

Silver Fern Shipping Ltd (SFSL) recognises that the rapid evolution in the use of, and reliance upon, digital (computer-based) and communication technologies, as well as the advances in automation and the potential for integration of multiple electronic systems supporting management functions and business applications, increases the importance of addressing inherent vulnerabilities.

A large proportion of security breaches are caused by people and poor processes so it is vital that all SFSL employees understand and implement appropriate and proportionate measures as outlined in the Integrated Management System to address the resilience and cyber security issues that arise and fully meet their responsibilities for the secure and safe operation of our business both at sea and ashore.

What is Cyber Security?

Cyber security can be defined as 'the collection of tools, policies, security concepts, security safeguards, guidelines, risk management approaches, actions, training, best practices, assurance and technologies that can be used to protect the cyber environment and organisation and user assets'.

'Cyber Environment' comprises the interconnected networks of both IT and cyber-physical systems utilising electronic, computer-based and wireless systems, including the information, services, internet of things (IOT), social and business functions that exist only in cyberspace. These systems will comprise a range of information technology components such as personal computers, laptops, tablet devices, servers and networking components such as routers and switches and operational technology such as wireless surveillance cameras, GPS, control systems, sensors actuators, radars etc.

'Organisation and User Assets' includes connected computer devices, personnel, infrastructure, applications, services, telecommunication systems, and the totality of transmitted, processed and/or stored data and information in the cyber environment.

What are the threats that need to be addressed?

The motivation for cyber-attack may include cyber misuse and disruption to systems through vandalism, activist groups seeking publicity or specific objectives, espionage for sensitive information, organised crime for financial gain, terrorism to cause disruption or warfare and conflict to gain advantage. The perpetrators are therefore individuals or groups, commercial competitors, cyber criminals, terrorists or state sponsored actors.

Handling Security Breaches

If you become aware of a breach of cyber security which may be in the form of unauthorised access to, misuse or fraudulent use of Company or Ship systems or related assets employees must raise the alarm immediately and notify your supervisor.

Authorised By:



Robert Walker
Group Chief Operating
Officer



David Borcoski
Group Managing Director & CEO



Adrian Whatley
Group Commercial and
Finance Director



Golden Rules

Silver Fern Shipping Ltd (SFSL) addresses our identified high risk activities through our Golden Rules of Safety.

The Golden Rules of Safety in the workplace are to be shared across all ASP employees and contractors and are to be fully understood and followed by everyone at all times.

SFSL's safety culture is everyone's responsibility!

It is based on a systematic process for identifying, assessing and managing risk through our risk management process, job safety analyses, ship/shore training, effective fatigue management, tool box talks, onboard/shore based HSSE meetings and through the implementation of our procedures.

Our Golden Rules are one component of **OUR** safety behaviour and they are to be observed by **YOU** at all times, whether at work or at any other time.

Our Golden Rules are the:

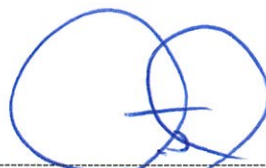
- Permit to Work System;
- Safe Navigation of the Vessel;
- Deployment / retrieval of the Gangway or Pilot ladder;
- Mooring operations;
- Machinery Equipment;
- Management of Change;
- Handling of chemicals and hazardous substances;
- Appropriate Personal Protection Equipment (PPE);
- Contractor Induction;
- Confined Space Entry; and
- Emergency Procedures.

Safety is a way of life


Authorised By:



Robert Walker
Group Chief Operating
Officer



David Borcoski
Group Managing Director & CEO



Adrian Whatley
Group Commercial and
Finance Director

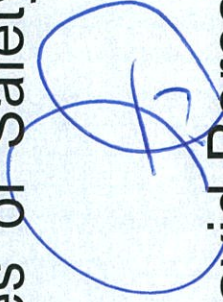


Vision Statement

To be a first choice globally positioned international Ship Management Company continuously delivering the highest standard of service that meets and exceeds client expectations through objectively measured performance.

We will provide a dynamic ship management service that is safe, environmentally conscientious, reliable, cost effective and which will add significant and sustainable value to our clients business.

This Vision will be accomplished with our core values of Safety and Integrity through performance and partnership.



David Borcoski

Group Managing Director & CEO
20th August 2019



Mission Statement

We Manage Ships Safely



David Borcoski
Group Managing Director & CEO
20th August 2019