SAFETY MANAGEMENT MANUAL

COMPANY POLICY

Ref.: IMO A.741(18) Resolution as amended by Resolution MSC.273(85)

1.2.1. 1 2 3 4 5	OBJECTIVES OF THE CODE ensure safety at sea prevention of human injuries prevention of loss of life avoidance of damage to the environment avoidance of damage to property
1.2.2.	SAFETY MANAGEMENT OBJECTIVES
1 2 3 4 5	provide for safe practice in ship operation provide for a safe working environment assess all identified risks to its ship, personnel and the environment and establish appropriate safeguards continuously improve safety-management skills of personnel ashore and aboard ships prepare personnel for emergencies relating both to safety and environmental protection
1.2.3. 1 2	SAFETY MANAGEMENT SYSTEM MUST ENSURE: compliance with mandatoty rules and regulations that applicable codes, guidelines and standards recommended by the Organization, Administrations, Classifications Societies and Maritime Industry Organisations are taken into account
	SAFETY AND ENVIRONMENTAL PROTECTION POLICY the Company should establish a safety and environmental protection policy which describes how the objectives given in the paragraph 1.2 will be achieved the Company should ensure that the policy is implemented and maintained at all levels of the organisation both ship-based and shore-based.
3. 3.3	COMPANY RESPONSABILITIES AND AUTHORITY The Company is responsible for ensuring that adequate resources and shore-based support are provided to enable the Designated Person(s) to carry out their functions

The policy applies to the vessels managed by MICHELE BOTTIGLIERI ARMATORE S.p.A., hereinafter called "The Company".

The Company is fully aware of its own responsibilities in this field and puts the utmost commitment in **Safety**, **Quality**, **Environment** and **Human Health** protection.

The Company establishes that all operations carried out by its own personnel, both ashore and on board the ships, must highlight the commitment in order to achieve the company objectives, herein listed, in order of priority:

- 1. avoid human injuries and loss of life;
- 2. protect the environment, particularly the marine environment;
- 3. maintain her ships at the highest technical and operational level;
- 4. protect ships and crews from the consequences of any illegal practises;
- 5. operate ships and transport goods in a safe and efficient manner.

The company requires that in case of conflict between economical or commercial reasons and the points above listed, the Master must decide giving priority to the latter according to the order above established.

Approved by General Manager Issuing date 01.09.2010

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In order to achieve the above mentioned objectives, the Company will provide the necessary resources and qualified personnel, defining its own organisation, identifying specific tasks and responsibilities, establishing training requirements and coordinating all its activities in such a way as to:

 ensure the safe operation of the ships and the environmental protection complying with all national and international applicable mandatory rules and regulations;

assess all identified risks and establish appropriate safeguards;

 improve continuously the technical competence and operational efficiency of shore and ships' personnel;

maintain the highest maintenance level of managed vessels;

be always ready, both ashore and on board, to manage emergency situations;

• apply, when and where necessary, the minimum industrial standards;

 assess all identified cyber risk and follow appropriate procedure and behaviour in order to keep the vessel always fully safely and operative, improving continuously the technologies and using newest software both onboard and ashore, in order to reach highest cyber security level and establishing specific cyber training for key person onboard and ashore.

The Company must inform all personnel of their specific duties and expect their commitment to achieve the above mentioned objectives.

However, for what concern the ship's operational, it is understood that the Master has the authority to act and issue orders necessary for the safety of life, ship and for the environment protection, even if they are in conflict with the procedures and instructions established by the Company.

The Master has also the responsibility to report immediately to the Company any accident or non conformity that could affect the safety of crew, ship or could determine an environmental pollution. For this purpose adequate human resources and means of communication are provided.

The effective application of the Company policy is regularly reviewed to ensure that the objectives are achieved and that the procedures and instructions are adequate and efficient.

Data: July 01st 2021

Approved by:

Capt. Michele BOTTIGLIERI

General Manager