



Drugs and Alcohol Policy Statement

Seagull Maritime Security provides maritime security services to assist in the protection ships, ports and other maritime assets. Seagull Maritime Security is committed to operate alcohol and drug free operations and to ensure at all times that personnel working on board are never under the influence of drugs or alcohol.

To this effect, the Company is committed to enforce the following rules which must be fully accepted and adhered to by all personnel:

- Alcohol and illicit drugs are not permitted on board any vessel or within any company buildings;
- Any person under the influence of alcohol or illicit drugs (for example, test results exceeding the permissible limits, unacceptable behavior) shall not be authorized to board a vessel;
- Any not complying with the above rules shall be immediately disembarked and submitted to disciplinary procedures;
- Being unfit through abuse of alcohol or drugs when travelling to and from the vessel will constitute gross misconduct under the disciplinary rules and procedures outlined in the Employment Contract.
- Any subcontractor or other personnel boarding a vessel shall be formally requested to comply with these rules and any such personnel contravening these rules shall be immediately disembarked;

In order to verify compliance with above rules, the Company seeks to organise regular testing of its own personnel and also reserves the right to perform random testing for all personnel on board whether or not there is suspicion of use of alcohol or illicit drugs.

Details for enforcement of this policy, verification of compliance by its personnel and disciplinary actions in case of non-compliance are contained within the Integrated Management System.

Seagull Maritime Security
Kfir Magen - CEO

Signed:

Name: Kfir Magen

Position: CEO

Dated: 12th June 2014