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INTEGRATED MANAGEMENT SYSTEM POLICY

Comprising of Quality, Environment, Ship Safety (including O, H & S) & Security

"Recognizing that good performance in respect of quality, ship safety, security, occupational health and safety and environment is paramount to the success of our business, we give highest importance to these subjects. Accordingly, we commit ourselves to:

- Fully conforming with the requirements of the international standards on these subjects, namely the ISO 9001, ISO 14001, OHSAS 18001, ISM Code and ISPS Code;
- Understanding and meeting the requirements and needs of our customers and striving to exceed their expectations;
- Complying with applicable Flag and Port State legal and other requirements related to our services and environmental aspects;
- Identifying, minimizing and controlling risks related to occupational health and safety, environmental impacts and security threats;

We have assessed the occupational health and safety risks, environmental impacts and security threats to our operations. These include, among others, potential fire and explosion hazards, exposure to variety of hazardous substances and situations and environmental impacts such as pollution of the sea by oil, noxious liquid substances, garbage, effluent and non-native microorganisms and pollution of air. Adequate safeguards have been put in place to ensure no spills to the sea and no incidents. Continual efforts are made to purchase materials which are environment-friendly and to reduce all types of waste and consumption of natural resources.

We respect the rights of all seafarers to decent conditions of employment and we operate to ensure that we do not violate the requirements of maritime labour conventions as a result of our business activities. As a trusted employer, we will ensure that all our employees are treated in a manner consistent with the Global Labour Principles and applicable laws and labour conventions such as MLC 2006.

Ships face threats from terrorism & Piracy for which adequate counter measures have been provided in compliance with the ISPS Code. Andromeda is committed to the provision of constant care and to the prevention of breaches of security associated with our operations. We rank security considerations equal to commercial and operational factors in the management of our operations. In close co-operation with the responsible authorities, we take all necessary measures to maintain the highest security standards at all times onboard our vessels and provide the highest level of security for our customers and employees .

Safe operation of the ship and protection of the environment are ensured through compliance with requirements of the ISM Code.

As part of our integrated management system, we periodically measure and monitor our performance which enables us to identify deficiencies before they may turn into undesired events. Furthermore, periodical assessments are carried out by certifying bodies.

We are continually in search of better performances and the most appropriate way to achieve them. We set ambitious but realistic objectives for ourselves, monitor our operations and processes, record and analyze the data and performances, report deficiencies and make use of



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improvement opportunities in order to anticipate and meet requirements before they become mandatory.

Andromeda Shipping prioritises minimising fuel consumption and air emissions. Therefore, we are constantly looking for cleaner and more fuel-efficient technologies and operational measures that will help us to maximise energy performance including energy efficiency and to reduce air emissions and emissions of greenhouse gasses.

We pay close attention to the selection and career development of our shore-based and shipboard personnel. We ensure that all personnel on our vessels are skilled and competent while senior officers have appropriate experience and training on the particular type and size of ship. We aim to recruit and promote senior officers from within the company whenever it is possible. We urge and encourage our senior officers to always lead by example in safety-related issues. Awareness about quality, ship safety, ship security, environment and occupational health and safety issues is an important and integral part of our appraisal system.

All personnel working for us and on our behalf are encouraged to implement the procedures associated with the integrated management system. Regular supervision, inspection and maintenance and periodical internal audit programs tell us the outcome of the training we provide to our personnel. These results can easily be recognized by those who come in contact with our committed personnel."

Chief Operating Officer
International Andromeda Shipping S.A.M.

Date: 16.01.2017