

	<b>ELBANA DI NAVIGAZIONE S.P.A.</b>	<b>HSSE Department</b>	Page: <b>1</b> of: <b>1</b>
		<b>COMPANY POLICY SAFETY POLICY</b>	Revision: <b>1</b>
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**The Company “Elbana di Navigazione”** recognizes that nowadays the working environment is badly affected by many risks of different nature. In this century the shipping cluster, in addition to the old safety and security matters, is facing the cyber risk. The management of a ship is more and more dependent on complex critical systems that make the Company and the Ship exposed to cyber risks and cyber-attacks which are becoming too frequent and advanced. The cyber events are always causing serious consequences that could be severe. **For these reasons the reduction or the elimination of the cyber risk is now within the primary objectives of the Company Policy.**

**The Company** is committed to take all reasonable precautions and measures, during the operation of managed vessels, in order to ensure safety at sea, prevention of human injury or loss of life, avoidance of damage to property and protection of the environment. Maximum effort will be dedicated to eliminate or reduce the cyber risk to the minimum and acceptable.

The Company’s goal is to achieve ZERO incidents of whatsoever nature through continuous improvement. To fulfil these objectives, the management is committed to the following approach:

- Compliance with mandatory rules and regulations and taking into consideration the Codes, guidelines and standards recommended by the IMO, Flag Administrations, Class Societies and Industry organizations, applicable to operations of managed vessels.
- Adherence to an Integrated Management System (IMS) by all Company’s employees, including managed vessels, which promotes the concept of safety, cyber risk and environmental excellence, continuous improvement and enhancement of personnel skills and cyber risk awareness since many events are caused by “non malicious” human factor.
- Assigning employees possessing sound skills and capabilities in required areas of responsibility, including adequate verification resources.
- Defining the organization, responsibility, authority and interfacing of the various management functions within the frame of the IMS.
- Providing for safe and environmentally sound practices and in the operation of managed vessels.
- Developing and implementing appropriate Cyber Defense measures and capabilities.
- Developing and implementing cyber risk control processes and measures to ensure continuity of shipping operations in accordance with governing Rules and the Best Marine Practice.
- Providing and maintaining a safe working environment on board to assist in preventing human injury and loss of life.
- Providing the necessary training to ensure that Company’s employees and crew members are capable of achieving safety and pollution prevention objectives in the work they perform as well as detecting cyber events and implementing the SMS procedures.
- Providing facilities, systems/equipment and a maintenance system that is suited for the purpose of achieving objectives.
- Conducting management review meetings and management system audits.
- Developing a Company Policy dedicated to the Cyber Security and part of the SSPs.

This Policy has the full support of Top Management and applies to all Company’s employees crew members inclusive.

Managing Director

Fabrizio Freschi

Created by: HSSE Department Date: 01 <sup>st</sup> March 2021	Checked by: Designated Person Ashore Date: 01 <sup>st</sup> March 2021	Approved by: Managing Director Date: 01 <sup>st</sup> March 2021	Reference: IMO Resolution A. 741 (18), as amended. Cross reference: SMS Manual
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