

TMS DRY Ltd

Company's Environmental Policy and Commitment – Environmental Measures

US Regulatory, Financial and Political Issues Affecting Shipping

CONTEXT OF THE COMPANY



The Company is involved in the shipping and marine transportation industry and aims to:

- *Operate its ships worldwide by maintaining high standards of safety and environmental awareness*
- *Conduct its business in an ethical and socially responsible manner*
- *Ensure environmental protection*
- *Take into consideration the special needs of the communities in which it operates*

CONTEXT OF THE COMPANY



In this context the Company shall:

- *Consider all requirements of any environmental international and national conventions, regulations, laws and requirements relevant to Company's activities*
- *Shall take all appropriate measures in order to fulfill or exceed their provisions*

ENVIRONMENTAL POLICY – MAIN POINTS



The Company's Environmental Policy has been established by the top management and mainly concerns:

- *Zero oil spills into the sea*
- *Zero marine and atmospheric pollution incidents*
- *Compliance with all applicable environmental laws, rules, regulations and requirements*
- *Quick and effective response to environmental incidents*
- *Show concern and respect for the environment*
- *Appropriate training of personnel both on board and ashore*
- *Commitment to continuous improvement in environmental performance*
- *Commitment to continuous reduction of environmental risks*

MANAGEMENT COMMITMENT



- *To ensure successful implementation of the Environmental Policy*
- *All management levels are aware of the management commitment and accept responsibility for working in order to achieve environmental continual improvement, as applicable to their responsibilities*

ENVIRONMENTAL MANAGEMENT SYSTEM - SCOPE



- ❑ *Ensure that Company vessels comply with all environmental regulations*
- ❑ *Identify Company's activities which may have an effect on the environment (aspects)*
- ❑ *Identify the associated impacts to the environment and assess their significance*
- ❑ *Establish programs in order to minimize the impact to the environment and monitor the effectiveness of these programs*
- ❑ *Provide appropriate training to all personnel involved with the EMS*
- ❑ *Develop and implement control measures in order to detect and prevent environmental violations and monitor the effectiveness of these measures.*
- ❑ *Comply with ISO 14001:2015 standard for Environmental Management*

ENVIRONMENTAL MANAGEMENT SYSTEM (EMS) SUMMARY OF CONTROL MEASURES



- ❑ *Anonymous Open Reporting System – Investigation of Open Reports – Rewarding Policy*
- ❑ *Clearly defined shore / ship personnel environmental responsibilities*
- ❑ *Environmental Familiarization / Training – Evaluations / Assessments*
- ❑ *Engineering Measures - Installation of Seals and Protective Boxes – Installation of Bilge Water Evaporating Tank and Primary Bilge Tank*
- ❑ *Pollution Prevention Equipment Periodical Testing and Maintenance*

CONTINUATION OF CONTROL MEASURES



- ❑ *Bilge Water and Oil Residue Production Monitoring*
- ❑ *Environmental Audits – Internal and External*
- ❑ *Periodical Inspection of Records and Log Books – Oil Record Book*
- ❑ *Environmental Meetings*
- ❑ *Declarations of Environmental Commitment*
- ❑ *Environmental Defect Reporting*
- ❑ *Environmental Posters*
- ❑ *Environmental Forms*
- ❑ *Surveillance Cameras*
- ❑ *Creation of a separate Environmental Department*

Anonymous Open Reporting System



- Dedicated phone number
- Dedicated fax number
- Dedicated email address
- Locked box on board vessels and at shore facilities

- **Rewarding Policy**

ENVIRONMENTAL RESPONSIBILITIES OF SHIP AND SHORE PERSONNEL



- *Clearly defined environmental responsibilities have been defined for ship and shore personnel and have been included in the EMS, together with an organizational chart of the Company*

ENVIRONMENTAL TRAINING



- *Training Managers at Company's Training Centers of Athens - Greece, Manila – Philippines and Constanta - Romania*
- *All training instructors: extensive training at Company's EMS*
- *Detailed Training Plan Matrix created with specific requirements for each shore employee and seafarer, depending on the rank*

ENVIRONMENTAL TRAINING



- ❑ *No seafarer is allowed to embark without successful completion of EMS pre-embarkation training*
- ❑ *Extensive initial training, for personnel who serve for the first time in the Company*
- ❑ *Refresher training, for personnel who rejoin Company vessels*
- ❑ *Training consists of lecturing, Computer Based Training (CBTs) and a number of assessments which must be successfully completed by the trainee*
- ❑ *There is a custom made CBT with the Company's EMS requirements, as well as off the shelf CBTs which were acquired*

Engineering Measures – Sealing System



Engineering Measures – Sealing System



Engineering Measures – Sealing System





SEALING SYSTEM CONTINUOUS IMPROVEMENT

Before





SEALING SYSTEM CONTINUOUS IMPROVEMENT

After



Engineering Measures – Bilge Evaporation Tk – Bilge Primary Tk



Additional Control Measures



- Pollution Prevention Equipment Periodical Testing – once per week
- Bilge Water and Sludge Production Monitoring



Additional Control Measures



- Environmental Internal Audits
- Environmental Expanded Third Party Audits
- Environmental Third Party Audits on Oily Water Separator – MARPOL Annex I Compliance

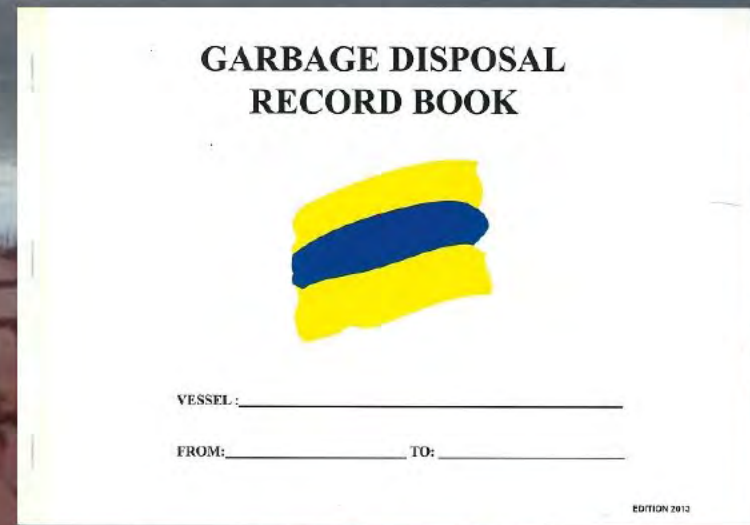
Additional Control Measures



Periodical Review of Records

Oil Record Book

Garbage Record Book

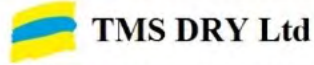


Additional Control Measures



- Monthly Environmental Meetings
- Declarations of Environmental Commitment
- Environmental Defect Reporting
- Environmental forms

OUR POSTER ONBOARD VESSELS



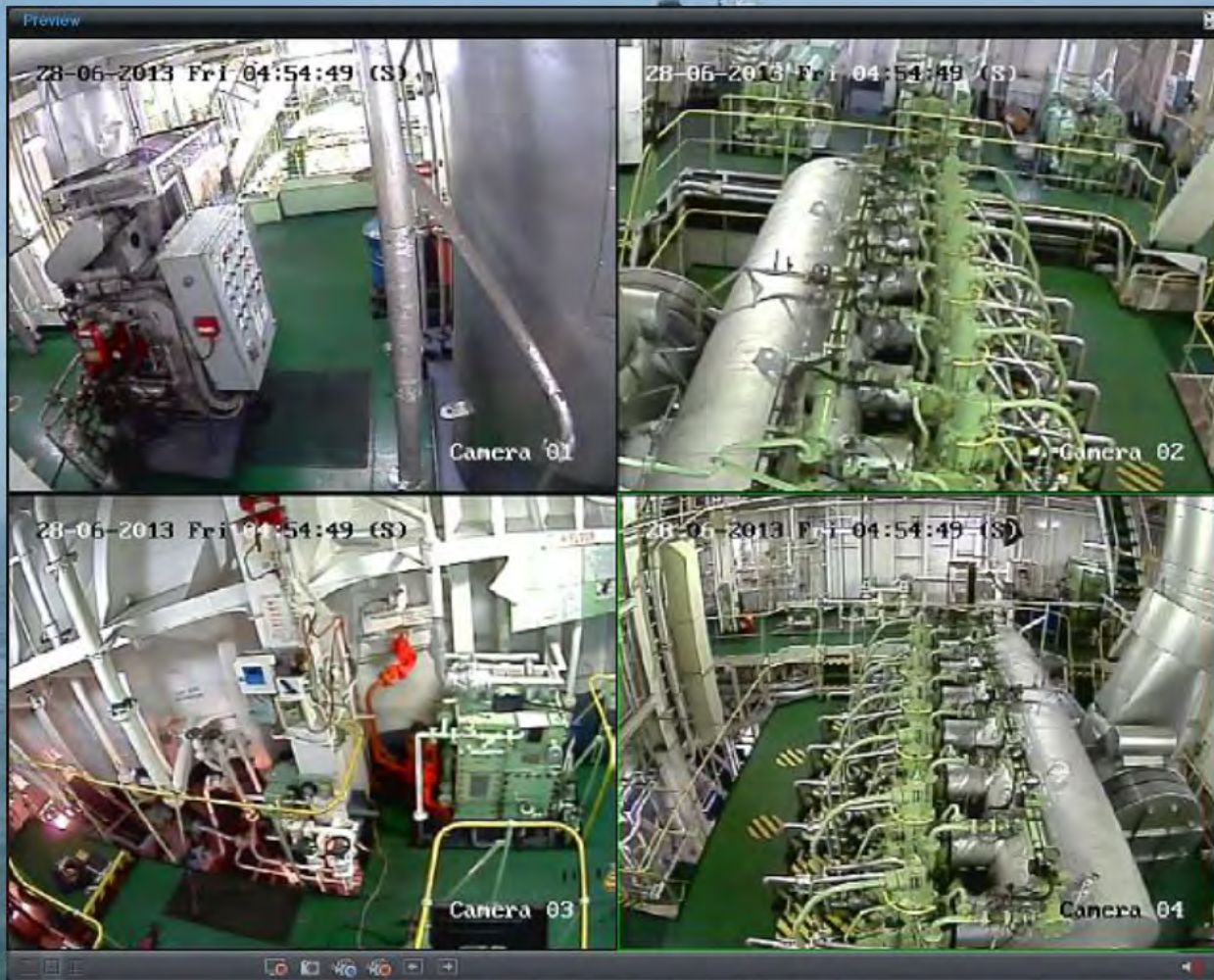
From Company to Seaman:
"Our commitment is ZERO pollution"



Bypassing The Oily Water
Separator Is A Short Cut To Jail!

Save the sea, save YOURSELVES!!!

Surveillance Cameras



Environmental Department



- *A separate Environmental Department was created which handles all issues relevant to the Environment, in cooperation with other Company Departments.*



REPUBLIC OF THE MARSHALL ISLANDS
MARITIME ADMINISTRATOR

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Office of the
Maritime Administrator
24 October 2012

SEAFARER DOCUMENTATION

TO:

SUSPENDED BY FLAG

Philippines

ADMINISTRATION

The Marshall Islands is investigating an allegation into a violation of MARPOL Annex I that took place on board the _____ on which you were the Chief Engineer.

Due to these allegations your Marshall Islands documentation is suspended pending further investigation. Please return your MI endorsement, _____, to us.

During this time you will not be able to serve on any Marshall Islands registered vessel in any capacity. Once the investigation has been completed, we will notify you of the Administration's decision as to the disposition of your Marshall Islands seafarer documentation.

We encourage you to respond with a statement within 60 days of the date of this letter. If none is received, we will continue the investigation with the information that we have available to us.

If you have further questions or need further clarification please contact me.

Respectfully,

Capt. David P. Freer
Deputy Commissioner for the Marshall Islands
Of the Republic of the Marshall Islands



Ethics and Non-Retaliation Policy



The Company's Management Team is required to be open and receptive to communication with any employee and shall welcome any positive suggestion and / or concerns from any employee, either on board or ashore, in accordance with the Company's documented procedures. This will allow employees to feel comfortable discussing any issues, without fear, and will alert the Company's Management Team.

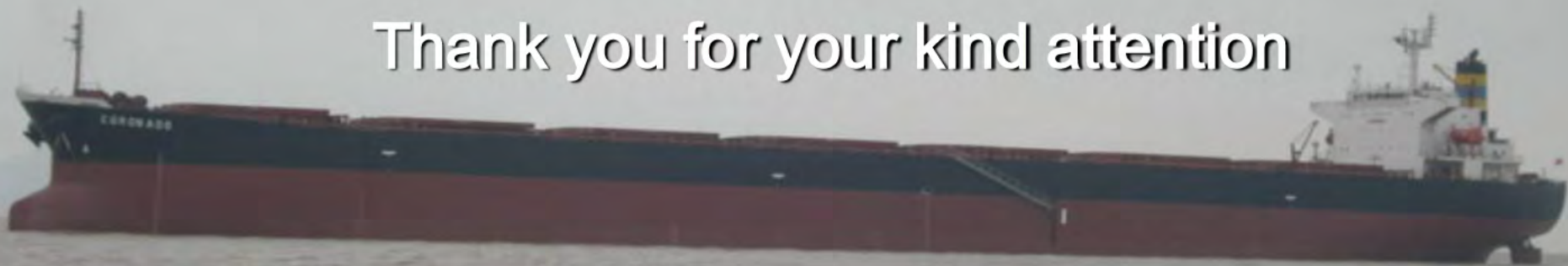


Non-Retaliation

- No individual who wish to report concerns for suspected violations shall be disciplined or otherwise retaliated for such reporting.
- Anyone who is involved in any act of retaliation or retribution against an employee who reported suspected misconduct in good faith, will be subject to disciplinary action or dismissal.



Thank you for your kind attention



TMS DRY Ltd