

**NON-CONFORMANCES, INCIDENTS, HAZARDOUS OCCURRENCES
AND OCCUPATIONAL INJURIES AND DISEASES REPORTING
ANALYSIS AND CONTINUAL IMPROVEMENT POLICY**

It is Company's policy to identify, record and evaluate problems within its management system as quickly and as efficiently as possible.

The purpose of this policy is not to seek to attach blame upon employees but rather to collect the necessary evidence that will enable the identification and rectification of root causes. The company encourages detailed reporting from the ships, especially of near misses and incidents.

Problems will automatically be deemed to arise upon:

- instances where the management system is found not to have been complied with
- failure to satisfy contractual requirements emerging from Ship Management Agreements and Charter Parties, including customer complaints
- detentions or safety related deficiencies issued by third party regulatory bodies such as Port State Control
- incidents that adversely affect the safety of the vessel or the environment
- hazardous occurrences (near misses) that could have resulted in incidents under different circumstances
- situations which result in urgent medical attention ashore (serious illness) or cases that have resulted in occupational diseases

All such problems upon their identification shall be consistently recorded and brought to the attention of responsible personnel for the necessary follow up.

All reported problems within Company's management system shall be the subject of an in-depth investigation directed towards:

- identifying the root causes of the problem
- determining the action needed to correct the problem and eliminate the root causes
- avoid similar re-occurrences
- minimise operational risk
- improving operational safety and pollution prevention
- improving Occupational Safety & Health conditions on board

All Corrective and Preventive action decided shall be timely implemented and verification controls shall be applied in order to ensure that corrective and preventive action is effective.

Furthermore, the company shall apply additional preventive action for identifying potential problem areas and initiating necessary control actions. This is primarily carried out through the active risk management system implemented, the periodical analysis of the Company Management System and the respective meetings, where the performance of the system shall be evaluated and discussed with a view to making improvements. The Company is committed to the concept of continual quality improvement through the progressive elimination of weaknesses and the minimisation of operational risks within ALARP risk levels.

Related Procedures

Incident, Serious Illness & Hazardous Occurrence Reporting & Analysis Procedure CP18
Non-Conformance Procedure CP21
Corrective & Preventive Action Procedure CP22