

Health & Safety Policy

The overall Health and Safety Policy of Astra Shipmanagement Inc., endeavors to:

- Prevent human injury or loss of life, **targeting to zero incidents** through continuous improvement;
- Ensure and promote occupational health and safety Culture on board Company's managed vessels and ashore;
- To assess all identified risks to its ships, personnel and the environment and establish appropriate safeguards;
- Prevent damage to the ship, her cargo and most importantly, the environment;

No task is so important that an employee, either on board or ashore, must violate a Safety Rule or putting himself at risk of injury or illness, in order to get it done.

This Policy shall comply with and exceed the laws and regulations of the flag state(s) of the ships under its management as well as the international regulations and conventions and the relevant standards and guidelines. It also shall comply with the requirements of the International Safety Management Code & 2006 Maritime Labor Convention.

In order to achieve the above-mentioned objectives, the Company shall endeavor to:

- Ensure that Master is given the necessary support to safely perform his duties;
- Provide adequate resources to facilitate goals achievement
- Provide healthy and safe working environment and decent accommodation conditions to all seafarers serving onboard;
- Continuously improve safety management skills of personnel ashore and onboard ships, including preparing for emergencies;
- Identify training needs of all personnel ashore and aboard ships;
- Ensure that no seafarer will perform his duties whilst impaired by drugs or alcohol;
- Actively encourage personnel participation in the implementation of the Policy by promoting a **just culture**;
- Operate managed ships within ALARP ("as low as reasonably practicable") levels of risk;
- Continuously improve its management system by taking corrective & preventive actions for identified problem areas.
- Ensure adherence, to the documented procedures via a system of internal verification of procedures and activities;

For accomplishing the aforementioned objectives, Astra Shipmanagement Inc., has developed and established a Safety Management System.

The Company, invites and expects all of its personnel to actively and consciously participate in the implementation of this Policy and objectives and the unconditional adherence to its procedures in order to achieve its targets.

This policy is expected to be implemented, maintained and communicated to all persons working for or on behalf of Astra Shipmanagement Inc.

Quality Policy

Astra Shipmanagement Inc., endeavours to earn the confidence of the shipowners, charterers, seafarers and the marine industry and other interested parties and be recognized as a high quality, trustworthy international ship manager. This can only be achieved by providing flawless services that satisfy all relevant requirements. The Company shall always provide professional ship management services to owners and charterers, protect their interests and assets under its care, and fulfil all their expectations.

The Company:

- Is committed to always comply with all applicable legal and other requirements that relate to the pertinent hazards and to continually improve the effectiveness of its IMS.
- Adopts a proactive approach concerning the needs of its clients and is responsive to their requests, suggestions or complaints, always trying to improve the value of its services.
- Encourages employee teamwork, personal improvement, cooperation, innovative thinking, initiative, leadership, decisiveness and focus on client's needs and satisfaction.
- Sets measurable and meaningful objectives and targets and reviews them when appropriate.
- Addresses the needs of interested parties who receive its services or who may be impacted by them.

In order to objectively assess its performance, the Company:

- Establishes criteria for the quality of its services.
- Monitors, measures and analyses its objectives and targets for continual suitability to verify that processes are effectively implemented.
- Identifies and manages the risks and opportunities of its services.

The IMS defines the methods used to achieve Company's Policies and the associated objectives and targets. Its implementation ensures that all applicable requirements related to managing ships will be satisfied, thus providing the necessary confidence between the Company and its customers.

The Company's management considers its IMS as the basic tool for providing consistent and effective ship management service and improvement, provides sufficient resources and reviews it regularly to ensure its continuous suitability and effectiveness. The management commits itself in active implementation of the IMS and requires all involved personnel to do the same.

Every suggestion for improvement will be given full attention and will be brought to the highest level of the management.

All Company's employees, ashore and at sea, are expected to comply with this policy and work towards achieving Company's objectives. The success of the Company depends on the commitment and involvement of each individual employee.

This policy is continuously reviewed for its suitability and is available to the public and the Company's customers, vendors and suppliers.

Environmental Policy

Astra Shipmanagement Inc., is committed to continuous efforts in order to establish a proactive approach to Environmental management for all identified sources of Marine and Atmospheric pollution, towards a cleaner environment.

The Company's goal is to achieve Zero spills or releases to the environment and reduction in permitted emissions through continuous improvement

In order to achieve this goal, the Company shall:

- Ensure that Master and designated Environmental Protection Officer, are given the necessary support to effectively perform their duties;
- Provide adequate resources to facilitate goals achievement.
- Systematically identify environmental hazards and take appropriate measures to eliminate or reduce environmental risks to ALARP (“as low as reasonably practicable”) level;
- Continuously improve Environmental management skills of personnel ashore and onboard ships, including preparing for emergencies;
- Respond quickly and effectively to environmental incidents resulting from its operations, in co-operation with industry organizations and authorized government agencies;
- Identify training needs of all personnel ashore and aboard ships in order to effectively and efficiently implement the policy;
- Actively encourage personnel participation in the implementation of the Policy by promoting a no-blame culture;
- Comply with all applicable environmental laws, regulations and requirements and apply responsible standards where these do not exist;
- Manage its business with the goal of preventing environmental incidents and of controlling emissions and waste streams;
- Use environmentally friendly methods for Clean Ballast water management.
- Take appropriate action, including immediate dismissal when appropriate, against any employee who obstructs, hinders or presents false information or makes false statements during any inspection, monitoring, or auditing of Company policies and activities;
- Strictly prohibit any incentive or bonus programs based on minimizing operational costs associated with the operation, maintenance or repair of machinery space systems, equipment and components, including pollution prevention equipment, to ensure that employees do not seek to avoid such costs and thereby sacrifice environmental compliance;

The Company's Environmental Protection Policy has the full support of the Company's Senior Management and requires compliance by all Company personnel, both ashore and onboard ships.

To successfully achieve the Company's objectives set forth above, Astra Shipmanagement Inc., has developed and implemented a Safety Management System.

The Company's Environmental Protection Policy and its Management System will be implemented, maintained and communicated to all persons working for, or on behalf of, Astra Shipmanagement Inc.

Drug and Alcohol Policy

Astra Shipmanagement Inc. recognizes that alcohol, drugs and other substance abuse by personnel can impair their ability to navigate a ship, operate a machine and perform their duties in a safe manner. A blood alcohol content of 40mg/100ml or greater is considered as alcohol impairment;

Therefore, Astra has adopted the following policies:

- No seafarer, irrespectively of rank, will navigate the vessel, operate its equipment or perform any assigned duty at any time while impaired by drugs or alcohol.
- Any seafarer found or suspected to be under influence of drugs or alcohol shall be immediately released from duty.
- All crewmembers must report immediately to the appropriate Officer or the Master, if they suspect or have evidence that one of their fellow crewmembers is under the influence of drugs or alcohol
- No person detected or suspected to be under the influence of alcohol or drugs is permitted to board a Company-managed vessel without being escorted.
- Illegal possession, consumption, distribution, sale or trafficking of drugs or alcohol onboard is strictly prohibited and is considered a criminal offence and will be dealt with in accordance to the law and will result in the immediate dismissal without notice.
- No spirits are allowed on board. Alcoholic beverages are forbidden in crew quarters. Consumption of alcohol beverages, only beer, at sea is allowed with meals under controlled conditions. Controlled conditions:
 - Officers and Ratings must consume the beer provided by the company with their meal in Officer's and Crew Mess rooms only.
 - An Alcoholic Beverage distribution list will be maintained by an appointed person (Master or Chief Stewart) and 2 (pre-opened) Alcoholic beverages will be distributed to each seafarer twice a week.
- No consumption of alcohol is allowed onboard while the ship is in port.
- Personnel must abstain from alcohol for at least 4 hours prior to taking over watch at sea or prior to any other scheduled work. Being unfit for work due to the use of drugs or alcohol is strictly prohibited and is grounds for termination of employment.
- Officers and ratings shall not consume more than 2 Alcoholic beverages (beer only) during any 24-hour period.
- Minimum 24 hours prior arrival in port, narrow waters, in port, during reduced visibility or at the Master's discretion serving of alcoholic beverages shall be interrupted.
- If a vessel is to enter US territorial waters, all crew are prohibited from the consumption of alcoholic beverages for 24 hours prior and until vessel has cleared US territorial waters.
- All officers and ratings are subject to pre-employment and unannounced drug & alcohol testing. Refusal to consent to the testing, falsification of a test or positive test results will result in the termination of employment.
- The misuse of legitimate drugs, or the use, possession, distribution or sale of illicit or un-prescribed controlled drugs on board ship is strictly prohibited
- Personnel on prescribed drugs must declare this fact to the Master upon joining the vessel, or upon prescription if prescribed during the period of service onboard. The Master, if on prescribed drugs, must declare this fact to the Company prior joining the vessel, or upon prescription if prescribed during the period of service onboard.
- Any use of a prescribed controlled drug which causes, or contributes to unacceptable job performance or unusual job behavior should require the seafarer to be excused from duty until such times as he is repatriated, or treatment and its after-effects cease.
- All Company officials, supernumeraries and visitors on board the ship, are subject to the same policy restriction, unless specifically authorized by the Company.
- Any person who is attending on board a ship to assist in the navigation, carry out repairs, or

maintenance, or for any other ship's business must not be allowed to carry out their respective duties if they appear to be impaired through drugs or alcohol.

- If any seafarer is concerned about the requirements of the Company's Drug and Alcohol Policy, he/she should immediately notify the Company through the Master or the appropriate manning agent, especially if he/she feels that he/she has a problem in complying with the requirements laid down.

Master must ensure that all above restrictions and controls must be followed by all crew members during the time they spend off the vessel in the various ports a vessel might call. When a crew member reports back onboard, they must abide with the company's Drug & Alcohol Policy. If a crew member is suspected to be under the influence of drugs or alcohol, they will be immediately be released from duty.

Energy Efficiency Management Policy

Astra Shipmanagement Inc., having established and implementing an Environmental Management System believes that although shipping is by far the most fuel-efficient mode of transport, nevertheless additional action has to be taken to improve the energy efficiency of ship related operations. The increased energy efficiency will eventually result in increased environmental protection by reducing air emissions as well as in improved operational performance by reducing energy cost. Energy efficiency is controlled primarily through well-planned and properly managed ship operations and needs the personal commitment of everyone involved in the above tasks. To be successful, energy efficiency and conservation must become a way of life than just a mere compliance with rules and regulations.

With the aim of enhancing its energy efficiency, the Company is committed to:

- Establishing, documenting, implementing, maintaining an Energy Management System with the objective of continually increasing energy efficiency and minimizing energy waste. A set of objectives and time specific, measurable, whenever practicable and possible and attainable targets, should be established and maintained, which should relate to a combination of design optimization, in-service performance monitoring and best-practice operational management processes.
- Establishing and maintaining a Ship Energy Efficiency Management Plan (SEEMP) which should be regularly reviewed by a senior management. This Plan, which applies to all fleet vessels, provides standard procedures and practice on best energy management under the various operational modes of each vessel.
- Ensuring the availability of information and of necessary resources to achieve the set objectives and targets.
- Promoting energy efficiency awareness through training to the shore and sea-going personnel and implementing energy related campaigns and other relevant personnel incentive/ motivating programs.
- Promoting co-operation within the shipping industry with the aim of facilitating energy efficient operations.
- Monitoring and complying with all applicable legal and other requirements related to ship energy management.
- Supporting the purchase of energy-efficient products and services, and design for energy performance improvement.
- Adopt technologies that can increase fuel efficiency.
- Reduce fuel consumption and thus CO₂ emissions by frequent hull & propeller cleaning always using best practice and environmentally friendly methods.

The Company's Energy Efficiency Management Policy should be periodically reviewed with the aim of being kept always updated so as to function as the driver for the continual improvement of energy efficiency.

All Company employees, shore based and sea-going are responsible for implementing the Company's Energy Efficiency Management Policy. The Company's Management is responsible for monitoring and reviewing this Policy at regular intervals in order to ensure that it remains relevant and effective. This Policy is communicated to all persons working for or on behalf of the Company and to the public through the Company's web site.

Navigational Policy

It is Company's policy to promote and establish sound and efficient Bridge Organization and Passage Planning with the objective to provide safe, reliable and efficient marine transportation. The safety of Life shall always take precedence over other considerations.

In order to achieve these objectives:

- Company has established procedures for a sound and efficient Bridge Organization, Passage Planning and Voyage Execution.
- Navigation of the vessel shall be based on the Bridge Team Management concept, which is based on the elimination of "one person errors";
- All Officers must be fully aware of Company's navigation procedures and COLREGS;
- All Officers must be familiar with their duties, the operation of all navigational equipment and the vessel's maneuvering capabilities;
- Current charts and navigational publications will be provided for all vessels by sub-contracted Chart Agents which shall be continuously updated by a designated officer on board;
- Alternatively, where an Electronic Chart Display and Information System (ECDIS) is fitted, same shall be continuously updated and operated by an appropriately trained and competent to use ECDIS designated Officer;
- Passage planning shall be prepared prior to voyage commencement and shall be approved by the Master. Execution of the voyage shall be based on the passage plan, with all the necessary modifications which may be required, considering the weather, traffic and vessel conditions prevailing at any stage of the voyage;
- All vessels shall carry out their voyages within the boundaries set by international laws and regulations and operate under the guidelines given by international maritime instructions;
- Time saving, distance and other "economies" must not be made at the expense of safety.

Nothing in this policy should be construed as relieving the Master, of his responsibility to exercise sound judgment at all times.

Fleet Maintenance Policy

Astra Shipmanagement Inc. is fully committed to maintaining all managed vessels in highest standards condition from both operational and cosmetic points of view.

A uniform maintenance schedule is compiled for all managed vessels, in accordance to manufacturers' requirements/specifications and applicable regulations. The Company's Technical department is responsible, in co-operation with the Marine/Engineer Superintendents and shipboard senior officers & Masters, for ensuring that an effective and prompt maintenance is carried out onboard managed vessels.

Environmental protection is also a primary concern. Through its maintenance policy, the Company pursues to achieve minimization of leakages from systems, equipment and components that are due to failure, wear and tear, aging, casualties and inadequate maintenance.

To this effect, the top management is committed to providing al necessary funds & resources for vessels' maintenance and repairs, without budgetary restrictions.

All shore and seaboard personnel are strictly required to adhere to this policy by fully complying with all relevant regulations, procedures and instructions.

Purchasing Policy

Purchases carried out, for goods or services considered critical for the quality of service provided by Astra Shipmanagement Inc., shall conform to specified requirements and shall be made against a list of approved suppliers. Exceptionally, in cases of emergency, the Master or the senior management ashore, will exercise control over the choice of supplier, specification requirements and verification activities.

- A clear specification of the goods or services required shall be defined prior to purchase orders. Requisitions are directed through the appropriate staff (Superintendents, Purchasing Operators, etc.) who will review this for accuracy, adequacy and specification data, as applicable, before approving the purchase.
- The decision to purchase and the level of control to be exercised shall be related to the criticality of the goods or service, their value and knowledge that the Company has of the particular market.
- The element of competitive bidding shall prevail throughout the purchasing process, but in no case at the expense of the quality of the service/product to be provided. The element of competitive bidding may not apply in cases of proprietary items or emergency situations.
- Suppliers' performance shall be monitored and evaluated.
- Delivery of purchased products or services shall be verified by competent personnel.

Shore Based Personnel Policy

It is Astra Shipmanagement Inc., policy to always employ adequate Shore Based Personnel committed to a high standard performance.

In order to establish the effective implementation of the Company's Management System the Company is committed:

- To employ personnel of adequate academic background and experience for the designated position
- To promote staff continuity, with an emphasis on developing people in key roles
- To verify that people employed are competent to carry out their duties
- To request all new employees (or personnel transferred to new assignments) to pass a familiarization and induction process before undertaking their duties. This allows them to become aware of the relevant and importance of their activities and how these contribute to the achievement of Company's objectives.
- To encourage personnel advancement, qualification and education
- To maintain adequate records of personnel details including staff qualifications, experience and training (Always in compliance with Company's GDPR Policy)
- To keep in touch with industrial trends with regard to operational, safety and environmental functions undertaken by personnel.
- To identify follow up training requirements and levels of competence and to arrange for appropriate training.

Manning Policy

The manning policy of Astra Shipmanagement Inc. focuses on crew management, career planning and competence. By setting appropriate selection and training standards, the Company ensures that each managed vessel is manned with qualified, duly certified and medically fit seafarers, in accordance with national and international requirements.

No Filipino seafarers are directly employed by Astra Shipmanagement Inc. Filipino seafarers are recruited by selected manning agent in Manila, who procures and trains seafarers exclusively for employment to managed vessels. In few cases other nationalities are employed via approved agents in European countries or directly by the Company.

Procedures are established to ensure that seafarers joining managed vessels are given proper familiarization with their duties. Pre-embarkation instructions are also provided.

The Company monitors retention rates for key staff and establishes procedures to ensure that training needs are identified and satisfied through appropriate training courses.

All employed seafarers are able to adequately communicate in a common working language, which currently is English. Established procedures and working instructions are also provided in English to ensure that relevant information is fully understood by all the concerned personnel.

All shipboard personnel involved in the Company's Management System have an adequate understanding of relevant rules, regulations, codes and guidelines and are able to communicate effectively in the execution of their duties.

Internet Use / Social Media Policy

The Company provides free “reasonable” access to Internet facilities on board its vessels, with aim to improve the welfare of its Seafarers.

This policy outlines the necessary principles that users of social media shall observe, the conditions in which Internet activity will be monitored and actions to be taken upon violation of the established policy. The Company, expects all individuals to comply with this policy at all times and to protect the Company’s reputation.

The Master shall be responsible to ensure that the below instructions are fully implemented on board and company’s initial settings are safeguarded:

1. In order to ensure that no fatigue will be built up due to excessive use of internet during the hours of rest, the internet use is restricted to 2 hours per person per day (00:01 - 23:59)
2. Each Seafarer has his own unique username and password for access to the Internet facilities in order above restrictions to be controlled.
3. The use of internet is prohibited in the Bridge & Engine Control Room.
4. Wi-Fi shall not be installed on the wheelhouse & Engine Control decks.
5. Personal devices such as mobile phones and laptops are not allowed on the Bridge and Engine Control Room.
6. Information received from the internet shall not be used for the ship’s operations, only the approved publications shall be used.
7. Business communication is safeguarded as per setting limits and Master have the authority to swith off / lock wifi access to the crew at any time, if he deems necessary in order to safeguard business continuity.
8. The use of internet is prohibited during working /watch keeping hours for all Officers and Crew including the galley department.
9. Age – restricted webpages and betting web pages are restricted for use.
10. Ship’s computers connected to the Internet shall be protected by anti-virus and shall be used for Business access only (Email, Updates etc). Visiting web pages from ship’s computers is strictly prohibited.
11. In order to raise crew awareness the following wording in format of a poster shall be posted in the smoking rooms Navigation Bridge & Engine Control Room and permanently stenciled in all cabins,;

Internet use – Fatigue awareness

Use of internet shall not be made in the expense of required sleep hours.

Sleep loss can lead to degraded alertness and performance and finally to fatigue related incident.

Social media is a very important tool for communicating with the world off the ship as well as keeping direct contact with family and friends. Such social media platforms as Facebook, Instagram, YouTube, Twitter, Snapchat and many others are great for keeping in touch, sharing information and general entertainment.

It should be remembered that the use of instant communication tools must be done so carefully, responsibly and with regard to negative consequences. The possibility of the use of an innocent post by the news media is an ever-present situation. A post that appears innocent from a seafarer’s perspective can be misinterpreted by the news media to show the ship and company in a very bad light.

It is entirely natural for a person to want to immediately share something. But when you share something online you have to remember that it is publicly viewable and open for scrutiny and criticism within a matter of seconds. It should also be remembered that a post which could be viewed

negatively can have a serious impact upon the corporate image and reputation of the shipping company you work for. If the information is released, then it is very difficult to locate it, let alone retrieve it in time for avoiding causing damage.

Therefore, great care must be taken to avoid posting anything which can be used to either contradict or negatively influence our company's image and reputation. During such times, the news media may make direct approaches to seafarers and any such approaches should be referred back to the company.

Therefore, here below are the golden 'Rules' to be followed:

- Never publish inaccurate information or preferably any information related to the workplace.
- Never publish pictures, videos or statements about incidents experienced on board Astra vessels. For this purpose, Astra Shipmanagement is circulating "Lessons Learnt" and "Incident Investigation" reports and relevant material after exhaustive investigation on factual evidence is undertaken. Posting of personal views and comments on such incidents are NOT ALLOWED.
- Always ensure that if you are talking about your workplace online, you have made it clear that any statements are your own and do not represent the views or values of the Company.
- Avoid violating the privacy of your fellow seafarers and co-workers. Only post online what you would be comfortable saying to people in person or in public.
- Never use social media as a platform to harm, intimidate, insult, threaten, defame or embarrass fellow employees, company's employees, customers, vendors, contractors, suppliers, competitors or others.
- The routes, port schedules and other commercial information of Astra vessels is confidential and should not be circulated to the public, as it could lead to serious and possibly legal implications for the company and those who have posted that information.
- Ensure you comply with all local policies and rules regarding social media, internet use and restrictions regarding photographs while the vessel is in port. Posts with port facilities on the frame may expose security & district information of the port to unwanted viewers and have legal implications for the seafarers, vessel and the Company.

Personnel who fail to comply with this policy may face disciplinary action and in serious cases, termination of their employment.

Cyber Security Policy

Astra Shipmanagement Inc., recognizes that the disciplines of confidentiality, integrity and availability in Cyber Security Management and the protection of life, environment, vessel and cargo from Cyber Attacks are integral parts of its vessels' management function. The Management of Astra Shipmanagement Inc., views these as primary responsibilities and fundamental to the best business practice.

Astra Shipmanagement Inc., Cyber Security policy seeks to operate to the highest standards continuously, including continual improvement and review.

We will:

- comply with all applicable laws and regulations and contractual obligations;
- implement continual improvement initiatives, including risk assessment and risk treatment strategies, while making best use of its management resources to better meet Cyber Security requirements;
- communicate its Cyber Security objectives, and its performance in achieving these objectives, throughout the organization and to interested parties;
- adopt a Cyber Security Management system comprising a Cyber Security manual and procedures which provide direction and guidance on Cyber Security matters relating to crew, employees, customers, suppliers and interested parties who encounter its vessels;
- work closely with its Business Partners and Suppliers in seeking to establish appropriate Cyber Security standards;
- adopt a forward-looking view on future business decisions, including the continual review of risk evaluation criteria, which may have an impact on Cyber Security;
- train shore based and seagoing personnel in the needs and responsibilities of Cyber Security Management;

Responsibility for upholding this policy is organization-wide under the guidance and with the assistance of the Senior Management and the IT Department who encourage the personal commitment of all Group Personnel to address Cyber Security as part of their skills.

Emergency Response Policy

Astra Shipmanagement Inc., The Company is committed to establish an emergency response system and regularly exercise it, to ensure an ongoing ability to react timely and effectively to incidents, accidents and emergency situations.

While every effort is made by the Company to ensure that the Health & Safety and Environmental Protection Policies are strictly followed, Astra Shipmanagement Inc., recognizes the importance of being able to deal with the consequences of any unplanned event.

In order to be prepared to respond to such situations, the Company:

- Has identified potential emergency shipboard situations;
- Has developed Emergency Response Plan providing procedures instructions and guidelines for Emergency Response purposes to both Shore Based & Sea Going personnel;
- Has in place Shipboard Oil Pollution Emergency Plans (SOPEP) for each vessel, and other response plans in line with local and state requirements (such as PCSOPEP & NTVRP) regarding vessel response in case of oil pollution;
- Has established and implements a specific Safety Drill/Test Programme;
- Ensures that every managed ship is supported by her Classification Society's Emergency Response Service or by an approved subcontractor;

Smoking Policy

Astra Shipmanagement Inc., remarks the harmful effects to health of tobacco smoke, mainly due to increased risk of contracting lung cancer and heart disease, and encourages those people who wish to quit smoking.

On board Vessels

It is Company's policy that Smoking by ship personnel or visitors onboard company vessels is strictly forbidden outside designated smoking places.

Smoking is only permitted in designated smoking areas, as directed by the Master, which are, while at sea:

- Officer's and Crew's Smoking Rooms;
- Engine Control Room (ECR);
- Conference Room / Ship's Office;
- Wheelhouse;

Right of no-smokers to breathe clean air prevails over the right of the smokers to smoke.

Smoking in Bed is absolutely prohibited.

In port, smoking is subject to port regulations/restrictions.
Designated smoking areas should be prominently marked.

Company Premises

Astra Shipmanagement Inc., in recognition of Health, Safety and Environment concerns, is committed to providing and maintaining a safe and healthy working environment for all its employees, visitors and contractors.

In line with this commitment as well as the applicable Greek Law (3730/2008) Astra Shipmanagement Inc., has adopted a NON-Smoking Policy in Company premises.

Objective of this policy is to provide a smoke-free environment in all the Company premises, in order to achieve a healthier and pleasant work place, safeguard non-smokers from the risks to health of passive smoke and protect the Company sites from increased risk of fire.

Restricted smoking areas are designated by the Company in open spaces.

Social Responsibility Policy

Astra Shipmanagement Inc., operates in a socially responsible manner, ensuring the safety of people and the environment, through transparent and ethical behavior, respecting the following principles:

- Accountability for the organization's impacts on society and the environment;
- Transparency in the organization's decisions and activities that have impact on society and the environment;
- Ethical behavior at all times;
- Respect, consider and respond to the interests of the Company's stakeholders and employees;
- Accept that respect for the rule of law is mandatory;
- Respect international norms of behavior, while adhering to the principle of respect for the rule of law; and
- Respect human rights and recognize both their importance and their universality.

The Company addresses the following core subjects in order to identify the issues and priorities that are relevant for the organization: Organizational governance; Human rights; Labor practices; Environment.

Our commitment to this objective is underscored by the daily actions of our employees and their dedication to the numerous programs and practices we have implemented.

We aim to integrate sustainable thinking and corporate social responsibility into all our business processes and business relationships. Employee skills and competencies are developed by continually raising awareness and impartment of training.

We recognize that our operations have a global influence. With this in mind, we work diligently with our employees, local communities and internationally recognized bodies to ensure that social factors are integral to our business principles.

We promote continual improvement as a principal driver by knowledge-sharing practices and the timely review of our management systems while always meeting or exceeding all applicable legislative and regulatory requirements.

Open Reporting Policy

Astra Shipmanagement Inc., is committed to conducting all aspects of her business with honesty and integrity, and to providing a working environment where high standards of ethical, moral and legal business conduct are encouraged and safeguarded. The Company is confident in the comprehensiveness and effectiveness of its Management System and its role in ensuring the safety of people and the environment, as well as in the effectiveness of its existing reporting channels.

Furthermore, the Company is committed to a workplace characterized by open communication regarding its business practices. As such, this Open Reporting Policy has been developed to provide a means for employees and seafarers to raise concerns that cannot be, or have not been, adequately addressed via usual reporting channels without fear of retaliation or discrimination over such reports made in good faith.

The Whistleblowing Policy addresses concerns related to issues of public interest, including, but not limited to, the following:

- A criminal offence;
- Non-compliance with legislation and/or Company procedures, particularly in relation to health and safety at work or environmental protection;
- Dishonesty, either verbal or written (including intentionally maintaining official log books or records inaccurately);
- Malpractice or unethical conduct;
- Financial or non-financial misadministration or malpractice or impropriety or fraud;
- A safety and/or security risk or hazardous condition that may impact the life or health of individuals on board the vessel;
- Miscarriages of justice; and
- The deliberate concealment of any of the above.

If an employee has a legitimate concern in (and holds reasonable belief that the information he has relates to) one of the above areas and wishes to raise the concern in good faith, it should be raised with the Master, DPA or other Company's representative who may be able to agree a way of resolving the concern quickly and effectively.

Although the Company's Top Management maintains an open-door policy endeavoring to address individuals' concerns internally, a concern can also be raised through the following channels:

*E-mail: **openreporting@astraship.com***
*Tel.: **(+30) 213 0175 100** (Open Reporting Hotline)*
*Mobile or SMS: **(+30) 6955 660170***

Reports can be made without fear of retaliation and be even anonymous. Upon receipt of a report, same will be assessed by the Company's Top Management and an investigation may commence, if deemed necessary. Any victimization of a member of staff who "whistle-blows", or any attempt to deter him from reporting, will be regarded as a serious disciplinary offense and will result in action under the Disciplinary Procedures.

EU General Data Protection Policy

The purpose of this policy is to ensure that Astra Shipmanagement Inc., complies with the provisions of the GDPR when processing Personal Data.

Astra Shipmanagement Inc. establishes, maintains and implements appropriate technical and organisational measures to ensure the security of Personal Data. Our Company collects the Personal Data in a transparent way and only with the full cooperation and knowledge of interested parties.

The Company expects from its employees, Crew Personnel and Third Parties Providers (i.e. port agents, Manning agents, contractors, external business partners, suppliers, visitors) to comply with the Regulation.

Any serious infringement of the Regulation will be treated seriously by Astra Shipmanagement Inc.

Data Protection Principles

Astra Shipmanagement Inc., sets the principles of collecting, organizing, retaining, modifying, forwarding, transmitting, keeping, managing, sharing and using of Personal Data according to the Regulation:

- Personal Data must be collected and processed for specified, explicit and legitimate purposes.
- Personal Data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Personal Data must be accurate and, where necessary, kept up to date.
- Personal Data must be kept for no longer than it is necessary for the purposes for which the personal data are processed.
- Personal Data must be processed in a manner that ensures their appropriate security

Procedures by Astra Shipmanagement Inc.

The Company:

- Adopts measures and procedures that ensure that by default only Personal Data strictly necessary for Astra Shipmanagement Inc., purposes are processed and these Data are not accessible to an indefinite number of natural persons within the Company.
- Defines the limitation period which the Personal Data shall be kept.
- Obtains the Data Subject's written consent.
- Ensures that persons authorised to collect, organize, retain, modify, forward, transmit, keep, manage, share and use personal data have committed themselves to confidentiality.
- Adopts measures against accidental loss, destruction, damage, alteration or disclosure of Personal Data.
- Undertakes to carry out an assessment of the impact of high-risk processing operations on the protection of Personal Data, especially when new technologies are involved.
- To be able to demonstrate that the Data protection principles are respected.

Third Parties Data Processors

Where external companies or individuals are used to process personal data for and on behalf of Astra Shipmanagement Inc, responsibility for the security and appropriate use of that data remains with Astra Shipmanagement Inc.

Where a third-party data processor is used:

- A Data Processor must be chosen which provides sufficient guarantees about its security measures to protect the processing of Personal Data;
- Reasonable steps must be taken that such security measures are in place;

- A written contract establishing what Personal Data will be processed and for what purpose must be set out;
- A Data Processing Agreement, available from Astra Shipmanagement Inc., must be signed by both parties.

A Third Party must process the personal data only to the extent required in the course of the work with Astra Shipmanagement Inc., and always in a strictly confidential manner.

Data Protection breaches

Where a Data Protection breach occurs, or is suspected, it should be reported immediately in accordance with the GDPR to Astra Shipmanagement Inc:

Confirmed or suspected data security breaches should be reported promptly to the Safety & Quality or Legal Department; as the primary point of contact on **+30 213 0175 100**, email: legal@astraship.com or sqe@astraship.gr . The report should include full and accurate details of the incident including who is reporting the incident and what classification of data is involved.

Contact

Queries regarding this policy or the General Date Protection Regulation at large should be directed to sqe@astraship.com & legal@astraship.com

Implementation

This policy will be updated as necessary to reflect best practices in Data management, security and control and to ensure compliance with any changes or amendments in the law.

Continual Improvement Policy

Astra Shipmanagement Inc., is committed to continually improve its organizational performance & management practices through the following:

- The compliance with the ISM Code and Flag Administration requirements
- A Companywide system for setting objectives and targets
- A comprehensive program of audit results
- Analysis of non- conformities and evaluation of corrective and preventive actions
- Analysis of accidents & incidents
- Monitoring and adoption of Industry and Company best practices
- An Active Risk Management System controlling operational risks
- A Management of change process
- The Management reviews where all the above are collectively evaluated and further improvement action is decided.

Through the above cycle of processes, the Company aims in tracking system problems and ensuring that the root causes are identified and eliminated.

Furthermore, by implementing an active risk management system the Company endeavors to control risk within acceptable levels and provide for a safe and pollution free environment.

The Company has defined a number of meaningful and measurable objectives and targets that result in improved organizational performance.

Such targets and objectives are consistently monitored and evaluated providing an objective measurement for the organizational performance.

The Company objectives & targets are communicated to all staff both ashore and onboard all managed vessels.

The Company's Senior Management shall assess at regular intervals the organizational performance and management practices to ensure the Management System's effectiveness. This documented review may identify the need for changes in the Management System, objectives & targets, as well as opportunities for further improvements.

Business Ethics Policy

Operating at the highest ethical standards is a key to any company's reputation in order to create and maintain trustworthy relationships. ASTRA is committed to maintain operational efficiency at high standards and response to market challenges; yet this is achieved by the continuous enforcement of a solid code of ethics and principles summarized below:

- Integrity,
- Transparency,
- Honesty and
- Responsibility.

ASTRA is committed to its employees and suppliers to comply with the relevant regulations and ethical principles.

Employees must exercise the highest level of integrity, ethics and objectivity in their actions and relationships which may affect the Company. In addition, Employees must not misuse their authority or influence of their positions but to act always for the Company's best interests.

As regards the Suppliers, ASTRA awards the business to the suppliers on basis of objective considerations including but not limited to the quality and best prices of the items & services offered. To ensure the highest level of objectivity in dealing with the Company's vendors, suppliers, contractors and agencies and to avoid the appearance of impropriety, employees (shore & shipboard) are not permitted to accept personal benefits, solicited or unsolicited, of any kind. This includes valuable gifts, free services, discounts, loans, lavish entertainment or other special favours.

At all times ASTRA's employees have an obligation to promote the Company's interests and avoid any situation which may involve a conflict of interest or the appearance of a conflict of interest between their personal interests and that of the Company. Every employee or crew member of ASTRA has a responsibility to inform the person in charge if they suspect corruption or are aware of any gift or hospitality given or received which may be in breach of this policy.

Breaches of this policy will not be tolerated by the Company and should such incidents of offered valuable gifts come to the attention of the Company, the cooperation with the involved supplier(s) will be immediately discontinued.