

## Olympic Shipping AS commits to continued support!

Olympic Shipping AS joined the UN Global Compact initiative in 2013 to strengthen our work within Corporate Social Responsibility.

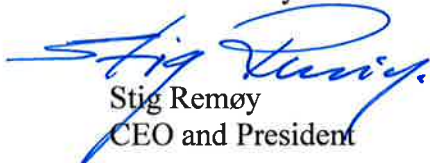
The Olympic group has the last years moved from being a offshore service vessel owner with high focus in the North Sea area, to have a increasingly global operation with an international work force.

The principles of the UN Global Compact gives Olympic a frame work for our business world wide.

The last year we believe to have increased awareness in our organisation by joining the UN Global Compact. As a result we have implemented a new main policy in our management system for social responsibility and equal opportunities.

We look forward to develop our work within CSR further with the UNGC as framework.

Yours sincerely



Stig Remøy  
CEO and President

## Communication of Progress

### Principles of human rights

#### 1 – Assessment, Policies and Goals

In our first year as a member of the Global Compact and as a first step, the company, in July 2014 created and approved Human Rights policy, as follows:

*Olympic Shipping AS and related companies (hereafter Olympic) support the ten principles of UN Global Compact with regards to human rights, labour rights, environment and anti-corruption.*

*This policy applies for everyone who works for, or on behalf of Olympic. The CEO, Captains and Department Managers on- and offshore are responsible to ensure compliance of this Policy across Olympic.*

*Suppliers, contractors, and joint venture partners working for Olympic in any capacity must act consistently with Olympic's values and compliance standards.*

#### **Human Rights:**

*All business in Olympic shall respect and protect internationally proclaimed human rights and make sure the company are not complicit in any human right abuses.*

*As a responsible employer, Olympic is committed to complying with relevant national statutory requirements and legislation.*

#### 2 – Implementation

This policy shows the interest of the Company to act pro-actively in the challenge that is dealing with the protection of human rights in the corporate environment.

Olympic has in it's QHSE Plan 2014 established a plan for a major survey within it's work force.

This work consists of survey with multiple criteria taking into account many aspects of Human Rights, the interview must be answered by all employees. Anonymously will be discussed, among other things, about environment, security, freedom of expression, equal opportunities and discrimination in the workplace.

Thus, according to these information, the company believes that can trace more accurately an employee profile, giving the company better tools for the elaboration of a code of conduct where the criteria of human rights, as for example harassment and discrimination, diversity, equality and others relevants topics can be established.

- The topics of the code of conduct will be shared in a systematic way to the vessels for the crew to discuss on their location at safety and welfare meetings, share in internal magazine, and at all other possible opportunity.
- Olympic has established through the implementation of MLC 2006 complaint procedures and forms including:

- The identification of the victim; Identification of the accused of the violation; Identification of the person or organization that is sending the complaint (this information will be treated confidential and confidential manner); The date and the place of the incident; A detailed description of the circumstances of the incident, where the alleged violations took place.

These complaints can, in a first moment, be sent to the DPA, a Designated Person Ashore (DPA) who is the person appointed to provide a link between the Company and the vessels with direct access to the highest level of management and to the crew. The DPA/MR has the independence, authority and responsibility to report deficiencies, performance, effectiveness and needs for improvement of the management systems to the Company's top management.

The DPA determines how complaints will be investigated and treated.

### 3 – Measurement of Results

The information acquired through these questionnaires, will be used for creation of goals and targets to be inserted in the QHSE Plans and evaluated in the annual management review.

Management review is a detailed report with information on the performance of programs and policies. Is the continuous monitoring of indicators that give the warning sign regarding the problems that must be faced by managers.

## Labour Rights

### 1 – Assessment, Policies and Goals

In July 2014 was created and approved the Labour Rights policy of Olympic Shipping AS. This policy is detailed below:

*Olympic Shipping AS and related companies support the ten principles of UN Global Compact with regards to human rights, labour rights, environment and anti-corruption.*

*This policy applies for everyone who works for, or on behalf of Olympic. The CEO, Captains and Department Managers on- and offshore are responsible to ensure compliance of this Policy across Olympic.*

*Suppliers, contractors, and joint venture partners working for Olympic in any capacity must act consistently with Olympic's values and compliance standards.*

#### *Labour Rights:*

*Olympic respects the freedom of association and the right to collective bargaining.*

*Olympic supports elimination of forced, compulsory and child labour. The business shall not in any way benefit from this.*

*It is the policy of Olympic that all employees will be provided with a workplace free of discrimination, harassment and victimization and treated with dignity, courtesy and respect.*

*In all workplace practices and in the provision of goods and services, Olympic is committed to ensure that regardless of gender, race, colour, disability (physical, intellectual or mental), religion, age, sexual preference, family responsibilities, pregnancy, political beliefs, national/ethnic origin, labour union activity or marital status, individuals or groups will not be treated unfairly or be disadvantaged.*

## 2 – Implementation

Olympic is member of the Norwegian Shipowners Association follows their collective bargaining agreements.

Personnel from crew agents are all employed by the respective bargaining agreements for their nationality and follows our supercedes the required of these agreements.

In our point of view, one of the main ways to meet the labour rights in our business is to meet and comply with all applicable laws, rules and regulations.

In our business we have to follow many, as can be seen below:

IMO (In addition, there are numerous other codes and conventions):

- International Convention for the Safety of Life at Sea (SOLAS)
- International Convention on Load Lines (LL)
- International Convention for the Prevention of Pollution from Ships (MARPOL)
- International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW)
- International Safety Management Code (ISM)
- International Ship and Port Facility Security Code (ISPS)

Besides of the maritime laws, Olympic Shipping AS adheres to all applicable laws for operating in Norway. All updated laws and regulations is found at website [www.lovdatab.no](http://www.lovdatab.no). Olympic Shipping AS subscribes to several services to keep updated on changes, like Sticos, Infotjenester, Skatteetaten, Dibkunnskap etc.

### **Maritime Labour Convention**

The implementation of the MLC 2006 was completed in August 2013 and is a important improvement to systemize labour rights for seafarer world wide. Most of the aspects of this was for Olympic already in place through the collective bargaining agreements and Norwegian Legislation, but it contributed to some systematic improvements. The following picture shows the procedures added to the management system.

Chapter 10 Maritime Labour Convention references				
00 Declaration of MLC (DMLC I / II)	SOM10-00	All	01	19.04.2013 English
01 Minimum Age	SOM10-01	All	00	17.04.2013 English
02 Medical Certification	SOM10-02	All	00	17.04.2013 English
03 Qualifications of seafarers	SOM10-03	All	00	17.04.2013 English
04 Seafarers' employment agreements	SOM10-04	All	00	17.04.2013 English
05 Use of any licensed or certified or regulated private recruitment an...	SOM10-05	All	00	17.04.2013 English
06 Hours of work and hours of rest	SOM10-06	All	00	17.04.2013 English
07 Manning levels for ships	SOM10-07	All	00	17.04.2013 English
08 Accommodation	SOM10-08	All	00	17.04.2013 English
09 On board recreational facilities	SOM10-09	All	00	17.04.2013 English
10 Food and Catering	SOM10-10	All	00	17.04.2013 English
11 Health and Safety and Accident Prevention	SOM10-11	All	00	17.04.2013 English
12 On-board medical care	SOM10-12	All	01	04/12/2013 English
13 On-board complaint procedure	SOM10-13	All	00	17.04.2013 English
14 Payment of wages	SOM10-14	All	00	17.04.2013 English
15 MLC Certificates for Crew Agents	SOM10-15	All	00	25.09.2013 English

## ISO standards

In addition to ISM code; Olympic Shipping Total Management system procedures also complies to:

ISO 9001:2008 Quality Management System  
 ISO 14001:2004 Environmental Management system

## DnV Class Rules and Regulations

Det norske Veritas is class society for Olympic Shipping AS and all vessels.

## Local laws and regulations

Olympic has subscription agreement with Nautisk Forlag AS who is responsible for issuing new publications and maps to vessels and management according to vessel specific lists. This subscriptions includes publications where all known regulations are included. DnV Navigator is also a tool where local regulations/checklists/reporting procedures can be identified. In addition to this local agents are instructed to keep vessel and management updated on local regulations and changes to this. In some countries this can be of great importance. Regarding handling of local tax laws, management operations/chartering department is responsible for seeking the necessary external advise to handle tax issues both for crew and company in a correct way.

## Bahamas laws and regulations

Olympic Shipping AS also holds Document of Compliance under the authority of the Government of The Commonwealth of Bahamas.

## Brazilian laws and regulations

Olympic also has to comply to laws and regulations on national, state and municipal level in Brazil, we must follow (Brazilian governmental database) SISLEG.

All these laws, codes, conventions, regulations means a high degree of complexity and compliance with labor policies from many different places on the planet. Therefore, we believe that the Company is at the forefront of institutions that watch over labor rights, not only locally, but globally.

Another very important way to conform labor rights in our policy is to provide healthy workplace, free of discrimination, harassment and victimization and treated with dignity, courtesy and respect. For this, Olympic employs many efforts devoting to protect and provide a safe and healthy workplace for its employees, through the active implementation of comprehensive policies.

Health, Safety and Environmental aspects of our operations shall always be considered with equal importance as other business objectives. Provisions shall be made to ensure that the best possible safety standards are maintained.

**The Overall health and safety objectives** of our Total Management System are to prevent:

Human injury or loss of life  
Health problems as a result from working in the company  
Damage to the environment, in particular to the marine environment  
Damage to the vessel, equipment or cargo  
Damage to 3rd party property

In order to achieve this, major efforts are required of Olympic Shipping AS and its employees. The following list includes the most important requirements to meet the objectives:

Provide for safe practices in ship operation and a safe working environment;  
Assess all identified risks to its ships, personnel and the environment and establish appropriate safeguards;  
Continuously work to improve safety management skills of personnel ashore and aboard ships, including preparing for emergencies related both to safety and environmental protection;  
Compliance with mandatory rules and regulations;

Applicable codes, guidelines and standards recommended by IMO, administrations, classifications society and maritime industry organizations are taken into account

These requirements shall be achieved by multiple specific actions and strategies. The company considers the most important to be:

- Clear and concise procedures, including both operational and contingency matters,
  - Detailed checklists to be used as a tool for controlling important elements of key operations;
  - Preventive maintenance of vessel and equipment managed via maintenance software;
  - Defined requirements of training, both within safety/environment and for competence building;
  - Defined requirements of familiarisation of personnel assigned to new duties;
  - Defined requirements and follow up of exercises/drills both on vessels and ashore;
  - Effective software tools for documentation and document control;
  - Effective process for reporting and handling of incidents and non-conformities focusing on root cause analysis and experience transfer;
- horough process for internal auditing controlling compliance towards policies, procedures, mandatory rules and regulations;
- Thorough process for masters review, management review, QHSE plan focusing on continuous improvement;
  - Assignment of duties to qualified and competent personnel;
  - Regular safety meetings with open dialogue and active participation of all personnel;
  - Requirements within use of PPE (Personal Protective Equipment);
  - Processes in place for keeping company personnel updated on applicable rules/regulations/guidelines;
  - Processes and tools in place for efficient Risk Management (Risk Assessments, Toolbox talks, Permit to work, etc.);
  - Active participation in the business for developing improved standards/practices;
  - Continuously work to build a company culture where compliance, safety awareness, open dialogue and pro-active reporting is appreciated.

### 3 – Measurement of results

The Company has its own evaluation and review system, as follow:

#### **Audit review meetings**

The Company carries out at regular intervals, review meetings to evaluate efficiency of the Total Management System.

The review meeting will address:

- Analysis of accidents, hazardous occurrences, non-conformities, customer complaints, environmental reports
- Internal audit findings
- Input from Master Reviews
- Input from Safety Meetings
- Company's performance in KPI's in the Total Management System
- Overall efficiency of the Total Management System and recommendations for procedural changes
- Results of external audits and complaints
- Organisational changes
- Identification of new plans, instructions or procedures
- Effectiveness of training methods
- Changes in relevant legislation, conventions, external conditions, operating areas, bargaining agreements, etc.
- Operation Departments yearly "Customer Follow-up Report"
- Follow-up actions of earlier Management reviews

To assure that conclusions, non-conformances and planned improvement areas are being put into action, the subjects shall be followed up in the QHSE plan or Through report in the Unisea HSE system. Planned action shall be addressed with necessary resources, time schedules and responsible persons/departments.

#### **Formal review**

The Total Management System is formally evaluated and reviewed at least once per year or whenever deemed necessary. The system is evaluated by both the shorebased organisation and by the Master in his Annual Review.

Branch offices shall perform annual separate management reviews covering relevant items with scope and deadline according to instructions from Main Office.

#### **Other reviews**

Evaluation and review of the Total Management System will also be carried out if circumstances or through the Company's continuous improvement process should so require.

## **Company Internal Audits**

The Company carries out a program of comprehensive internal audits, both ashore and on all vessels, to verify that activities comply with the Total Management System, covering the requirements in the following codes: ISM, ISPS, ISO 9001 and ISO 14001.

## **Responsibility**

The QHSE department is in cooperation with the Technical dept responsible for planning and performing Internal Audits on the Total Management System at intervals not exceeding twelve months.

## **The Audit**

The Audit Plan is followed-up by the QHSE Department in accordance with company procedures. Audits are to be carried out by trained auditors.

## **Technical Inspections**

To assure that the vessels complies with the standards/requirements set forth in Total Management System/TM Master, the Company shall visit the vessels for technical inspections at appropriate intervals. This type of inspections should be carried out and documented at least once per year per vessel..

The SVP Technical is responsible that such inspections are performed by his department and annual plan is integrated in QHSE departments Company Audit Plan and followed -up.

## **External Audits**

The company is also subject to various external audit, just to name a few we have:

Den Norske Veritas - DNV Audit, Peotram Audit, INCENTRA, Port States, etc.

# **Environmental Principles**

## **1 – Assessment, Policies and Goals**

Olympic has through it's history maintained a sharp focus in improvement within environmental performance. The company got in 1999 delivery of the 2nd diesel electric offshore vessel in the world. The years to come showed this to be a game changer for the offshore service fleet that has made this fleet world wide dramatically more energy efficient.

Olympic was certified towards the ISO14001 code in 2006 as one of the first offshore service vessel managements. In this process Olympic also established it's separate Environmental policy signed by the CEO.



## **ENVIRONMENTAL POLICY**

*This policy shall apply to anyone engaged in any Olympic Shipping activities. All personell have a duty to act responsibly to prevent damage to the environment*

*We have a vision of zero emission to air and water from our activities.*

*We have a goal of zero spill to the environment.*

*We will continuously work to reduce environmental impact and risk related to our activities.*

*We will always work to improve our energy efficiency and environmental performance.*

*We will set specific environmental targets and improvement measures which shall be rewieved and audited annually.*

*We will comply with all applicable legislation and regulations and our own requirements for environmental aspects, including ISO 14001:2004.*

*We will be in the forefront in our business in environmental issues and strive to use best available equipment and techniques.*

*We will communicate the environmental policy and targets to all personnel involved in our activities and make our environmental policy available to the public on our web-site. Environmental aspects overview will be regularly reviewed as part of company's management review.*

*We will always have an overview of identified impact on the environment through regular and frequent reporting from the vessels.*

### 2 – Implementation

As a result of this Olympic has established system for reviewing all environmental aspects of the operations and regularly review the aspects.

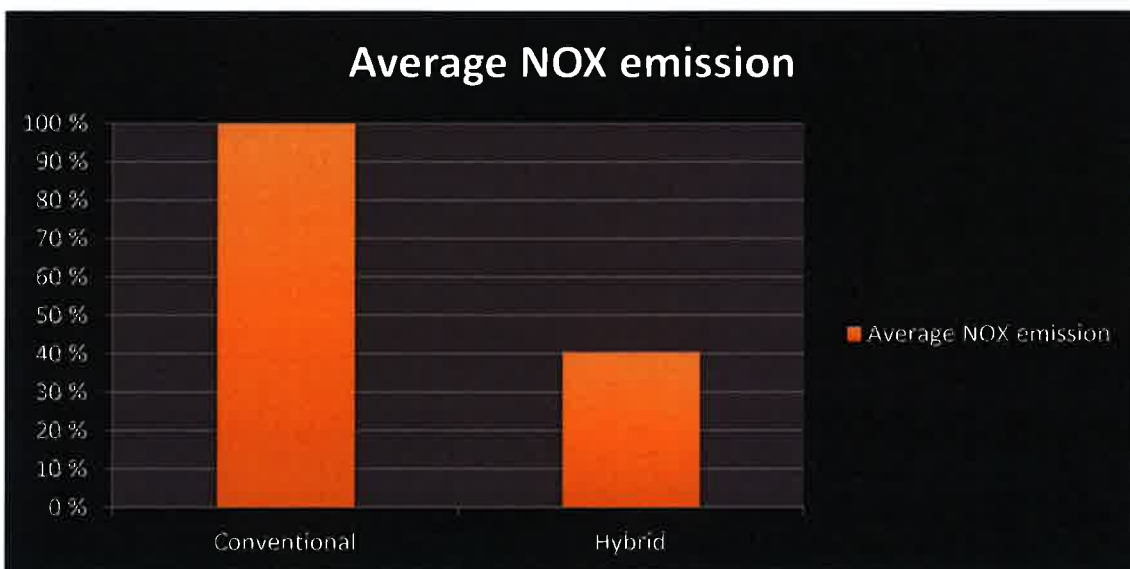
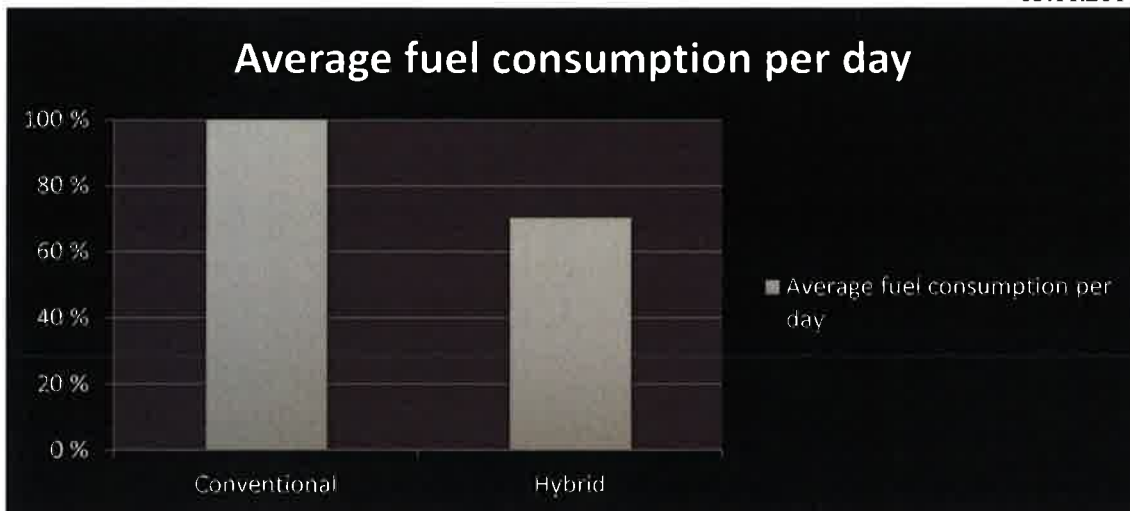
In addition the company holds a online database where all relevant environmental aspects are recorded to keep overview for each vessel and company.

Since the establishment of ISO14001, Olympic has performed an annual environmental review lead by the companys top management team.

The result of each review is to establish annual environmental targets for the company to reduce the environmental foot print.

### 3 – Measurement of results

Olympic has assessed emission to air of CO<sub>2</sub>, SOX and NOX to be the most critical environmental aspects of our operation. The focus has therefore for years been on reducing these. As an example the figures below shows the result of implementation of new technology in fleet segment called AHTS.



## Anti-corruption principles

### 1 – Assessment, Policies and Goals

“Doing things in the right way” This is the slogan of Olympic and this in itself demonstrates the company's position on electing in addition to operational best practice an attitude of social integrity. Olympic believes that corruption is a complex phenomenon. The fight against corruption is not at all an easy task, unlike, there are several challenges to be faced. However, although the path to be taken in the fight against corruption is long, the work has already started to be made. In our first year as a member of the Global Compact and as a first step, the company, in July 2014 created and approved its anti-corruption policy as follows:

*“Olympic Shipping AS and related companies (hereafter Olympic) support the ten principles of UN Global Compact with regards to human rights, labour rights, environment and anti-corruption. This policy applies for everyone who works for, or on behalf of Olympic. The CEO, Captains and Department Managers on- and offshore are responsible to ensure compliance of this Policy across*

*Olympic.*

*Suppliers, contractors, and joint venture partners working for Olympic in any capacity must act consistently with Olympic's values and compliance standards.*

**Anti-corruption**

*Business in Olympic shall be conducted in a fair and transparent manner.*

*Activities shall be in compliance with all applicable laws and regulations that prohibit corruption, bribery and extortion.*

*The Company will do its utmost to support anti-corruption behavior.*

*Everyone in Olympic has a responsibility to report any appearance of dishonesty and corruption to the appropriate level.*

*The Norwegian Working Environment Act regulates and protects the employees' right to act as a Whistleblower.*

*We extend this right as a policy to all areas across Olympic".*

This policy give us improved tool to deal with anti-corruption issues.

It is the company thus implement specific programmes for the consolidation of these values and principles, making these clear for several segments, such as employees, suppliers, shareholders, competitors, etc. We must above all build sustainably integrity values, which presupposes the development of a set of rules and institutions that define ethical and behavioral standards. Ethical values must therefore be one of the pillars of the construction of a system of corporate integrity. To consolidate our anti-corruption policy, the next step is the preparation of a code of conduct, establishing ethical values to be followed.

Through this code of conduct, not only the agents acting on behalf or in the name of Olympic, but also all other stakeholders can take cognizance of the principles, values, norms and forms of activity of the company.

## 2 – Implementation

The existence of standards that feature on ethics, by itself, does not guarantee the ethical behavior. It must be disclosed and monitored in the Company, so the rules of conduct can be known and well understood by all who serve.

Olympic's code of conduct will be prepared and approved, from there:

- This code will be published in various channels, as a meetings of leaders, trainings, inductions, institutional magazine, web site, etc;
- The code of conduct should be released, also for the other groups of relationship, such as suppliers, shareholders and Government authorities;
- The code of conduct should be released in the company's Intranet;
- Presentation of positive results from the implementation of the code of conduct on the Company.

In a first moment, the company will use as a direct channel between the Company's management and the employees, a Designated Person Ashore (DPA). The DPA will be responsible to collect complaints related to this topic. This person is educated and trained according to IMO guidance on Designated Persons and has full insight of the Company's policies. Including now the anti-corruption policy.

## 3 – Measurement of results

### **Internal Control**

Internal control is defined as the set of actions, methods, procedures and routines that an organization carries on its own actions, in order to preserve the integrity of your assets and examine the compatibility between operations carried out, the pre-set parameters, principles and agreed targets. Your goal is,

therefore, reduce the vulnerability of the Organization to risks, seeking to identify and correct any deviations from the parameters and guidelines, including financial and accounting previously established. Therefore, have transparency as one of the bases for sustainable development confirms the company's commitments with a ethical management and guided by social interests. In this sense, Olympic has internal audit controls suitable for preventing and detecting acts of corruption. The company submits your accounts and its accounting statements the frequent audits and certification procedures.

### **Approved Suppliers**

To make the actions of the Company more transparent and work against corruption, Olympic is a member of the INCENTRA, a marine purchasing organisation, who works as a consultant in the selection of the suppliers who obey the principles and policies in support of anti-corruption.

Olympic has also joined forces with 2 other offshore service companies to cooperate to audit common critical suppliers.

### **External Audits**

As an example of external control, Olympic follows a rigid program of audits to ensure transparency in our business and consistency with the anti-corruption commitment, including periodic financial reviews undertaken by third party companies such as BDO Nor, the fifth largest accountancy network in the world, it carries out various annual audits in order to assess the financial health of the company and accurately map the use of its resources.

The company is also subject to others externals audits. like:

Den Norske Veritas - DNV Audit, Peotram Audit, Port States, etc. We cite these various audits because we understand that each one of them contributes in some way to assess the transparency in the company's business, valuable anti-corruption principles are scattered inside the concepts that guide these audits.